

ENCLOSURE B

NOTICE OF VIOLATION

Kansas Gas & Electric Company
Wolf Creek Generating Station

Docket: 50-482/84-51
Permit: CPPR-147

Based on the results of an NRC inspection conducted during the period of October 23 through November 2, 1984, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified.

10 CFR Part 50, Appendix B, Criterion III, requires that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2 and as specified in the license application, are correctly translated into specifications, drawings, procedures, and instructions.

10 CFR 50.2 defines "design bases" as that information which identifies the specific functions to be performed by a structure, system, or component of a facility, and the specific values or ranges of values chosen for controlling parameters as reference bounds for design.

Section 8.3.1.4.1.1 of the licensee application specifies that cables from different separation groups will, in accordance with IEEE Standard 384-177 practice, be in steel conduit or enclosed raceway or separated by a fire barrier when the normal 5-foot and 3-foot horizontal separation cannot be maintained.

Section 8.1.4.2 of the license application specifies that deviations from the IEEE Standard 384-1977 practice which reduce the minimum spatial separation between circuits be supported by analysis and, in accordance with the specified Regulatory Guide 1.75-1974, be considered part of the licensee's application.

Contrary to the above, a number of nonsafety conduits to safety cable trays and cables exiting the trays did not meet the spatial requirements for cables from different separation groups in accordance with your commitment to Regulatory Guide 1.75 and IEEE-384, nor was such deviation supported by an analysis, as specified in the license application.

Details of this finding are discussed in Section III.B.1.b.(2).(e) of this report.

This is a Severity Level IV Violation (Supplement II.D) (50-482/8451-01)

Date: JAN 3 1985

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ENCLOSURE C

UNRESOLVED ITEMS

As a result of the NRC special construction verification inspection of Wolf Creek Generating Station, a number of findings were made that require further action by Kansas Gas and Electric Company before the NRC can determine their significance. These findings, listed below, will be followed by NRC Region IV as unresolved items (section references are to the detailed portion of the Inspection Report).

1. Two areas of minor deficiencies identified by the NRC SCVI were verified by DIC to be generic and require further action by them to correct existing deficiencies and prevent future deficiencies from developing: the securing of cable at raceway rollouts, and minimum bend radius for cable transferring from tray to conduit. [Section III.B.1.b.(2).(a)]
2. Three areas involving the incorporation of inspection criteria or the recording of inspection criteria were noted and require additional review by the licensee for resolution:
 - a. No requirement for consideration of concrete spalling in obtaining and verifying expansion anchor minimum embedment. [Section III.B.1.b.(2).(d)]
 - b. Request for Clarification or Information 21D-7158 regarding Unistrut installation inspection provides an acceptable condition for sidewall deflection which has not been incorporated into the inspection criteria. [Section III.B.1.b.(2).(d)]
 - c. Generic Resolution F-014 does not require documenting acceptance criteria drawing and specification numbers and revisions on the QC checklists although required to do so by the QC procedures. [Section III.B.3.b.(2).(c)]
3. The acceptability and generic implications of vendor termination lug bending, as found in panel RP-210, requires additional licensee evaluation. [Section III.B.2.b.(2).(b)]
4. Two items found on the rack for battery NK-12 require additional evaluation to determine acceptability and generic implications: the actual torque values of the brace pad bolt assemblies, and quality of the rack plug welds. [Section III.B.3.b(2).(c)]
5. The reinspection of welds in accordance with the criteria referenced on Bechtel purchase orders, not used in the CSA, is required to provide a basis for implementation of corrective action. This should be done

following the removal of paint from the welds or following an engineering evaluation of the acceptability of the method of inspection of vendor welds through paint. [Section V.B.2.c]

6. KG&E needs to contractually delegate responsibility for the use of written procedures and criteria that would alleviate organizational disagreements concerning implementation of corrective action. [Section V.B.2.c]
7. As a result of the independent SCVI team review of the Dravo film, 33 film packets were found to be marked with a material thickness different from that shown on the reader sheet. [Section V.B.3.c]
8. A review of concrete batch ticket records identified a deviation from contractor ANSI N45.2.6 requirements in that a Level I rather than a Level II qualified inspector evaluated the results of inspections by a Level I inspector. [Section VI.B.1.b.(2).(c)]
9. The CSA evaluation and disposition for CSA concern #55 relative to the attachment of non Q field routed tubing to a Q whip restraint did not consider loading from the tubing attachment and whether there was an adequate program for control, design evaluation and as-builts of tubing attached to Q supports. [Section VI.B.2.b.(2)]
10. Bechtel Drawing C-1C2411, Revision 0, Detail 1 requires the projection length of concrete anchor bolts to be 7" above the underside of the top flange of the safety injection accumulator tank (#TEP-01A) base frame. According to DIC personnel present at the time of the SCVI, a $\pm 3/8$ " tolerance was allowed, permitting the total maximum projection length to be 7-3/8". The inspector(s) found that six out of the twelve embedded concrete anchor bolts had projections above the top flange greater than 7-3/8" which exceeds the maximum allowable. [Section VI.B.3.b.(2)]
11. The material traceability for cabinet to cabinet fasteners for Motor Control Centers NG01A, NG01B, NG03C, NG03D and NG04C could not be established due to lack of required traceability markings and were also either missing or were improperly installed. [Section VII-2.b]
12. The material traceability of battery rack NK12 fastener assemblies could not be established due to lack of required traceability markings or because they were missing.
[Section VII-2.b]
13. High strength steel anchor bolts for main coolant pump and steam generator supports were made of indeterminate material. [Section VII.2.b]
14. Safety Injection Accumulator Tanks TEP-01A and TEP-01B had anchor bolt nuts installations not in accordance with drawing requirements. [Section VII.2.b]
15. An acceptable resolution of TE:57061-K111, Design Control audit findings pertaining to DIC implementation of Field Change Requests is needed.
[Section IX.B.2.b.(2)]

16. The CSA evaluation of KG&E response to CSA concern #159 needs to address and resolve the differences in the KG&E and CSA count of audits not conducted, including any pertaining to audit of construction activities performed by other than DIC. The CSA evaluation should also review the adequacy of KG&E's response on the impact of not conducting audit TE:57061-K111 on schedule has on the assurance of quality of construction prior to plant operation. [Section IX.B.2.c]
17. The KG&E evaluation of SFR 1-BB-147 for reportability to the NRC and of the related controls for the tighten of termination lugs during installation is identified for review. [Section IX.B.3.b.(2)]
18. The CAR #18 and the CSA concern #160 action plan should be revised to include additional clarification of intended corrective action requirements involving SFRs for resolution of "design errors" or without "identifiable or retrievable documentation". [Section IX.B.3.b.(2)]
19. Appropriate revision of procedure ADM 14-416, Rev. 0 is required to prevent recurrence of deficiencies in the use of NDCs of the type discussed in the KG&E report KQWLO 84-134. [Section IX.B.3.b.(4)]
20. KG&E should audit a sample of NCRs issued after the close out of NDCs for compliance with procedure AP-V1-02, Section 3.30 provisions of "prior to and after N-stamping" of ASME systems/components. [Section IX.B.3.b.(4)]
21. The KG&E/CSA corrective actions should ensure that the KG&E program for identification and review of deficiencies for reportability to the NRC is being implemented in a timely manner for: SFR or NCRs checked "potentially reportable"; and for deficiencies in construction which could have gone undetected due to the breakdown in the SFR QA program, as identified by the TE:50140-K003 Design Control audit. [Section IX.B.4.c.]