#### APPENDIX

#### U. S. NUCLEAR REGULATORY COMMISSION

NRC Inspection Report: 50-482/84-55

Construction Permit: CPPR 147

Docket: 50-482

Category: A2

Licensee: Kansas Gas and Electric Company (KG&E) Post Office Box 208 Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station

Inspection At: Wolf Creek Site, Coffey County, Burlington, Kansas

Inspection Conducted: December 1 to 15, 1984

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Inspectors:

G. Baldemond, Chief, Resident Inspection Program, Wolf Creek Task Force, (pars. 2, 3, 4, 5, and 7)

Date

H. F. Bundy, Resident Reactor Inspector, Wolf Creek Task Force (pars. 6, 7, 8, 9, and 10)

Approved:

L. E. Martin, Section Chief, Wolf

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Creek Task Force

# Inspection Summary

Inspection Conducted December 1 to 15, 1984 (Report 50-482/84-55)

<u>Areas Inspected</u>: Routine, unannounced inspection including previously identified findings; IE Bulletins and Circulars; 10 CFR 50.55(e) reports; preoperational test procedure review; preoperational test activities; plant tours; maintenance activities; emergency procedures; and event followup. The inspection involved 120 inspector-hours onsite by two NRC inspectors including 24 inspector-hours onsite during offshifts.

<u>Results</u>: Within the 9 areas inspected, no violations or deviations were identified. Ten open items were identified (paragraphs 4 [8 items], 5, and 6) and two unresolved items were identified (paragraph 4).

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## DETAILS

## 1. Persons Contacted

#### Principal Licensee Personnel

- F. Faist, Assistant Lead System Supervisor
- \*F. McLaurin, Assistant Startup Manager
- \*M. G. Williams, Superintendent of Regulatory, Quality, and Administrative Services
- 0. Maynard, Licensing Supervisor
- R. Stright, Licensing Engineer
- \*H. Chernoff, Licensing Engineer
- W. Rudolph, Quality Assurance Manager
- G. Tarwater, System Startup Engineer
- S. W. Hulett, System Startup Engineer
- H. Lerma, System Startup Engineer
- D. Turinetti, Reactor Operator
- J. Gilmore, Reactor Operator
- D. Goodlove, Mechanical Supervisor
- \*W. M. Lindsay, Quality Systems Supervisor
- \*R. L. Hoyt, Emergency Plan Administrator
- \*K. R. Ellison, Startup Technical Support Supervisor
- \*F. T. Rhodes, Plant Manager
- \*R. M. Grant, Director-Quality
- \*C. C. Mason, Site Director
- \*C. J. Hoch, QA Technologist
- \*R. D. Flannigan, Site Representative, Kansas City Power and Light

Other Personnel

W. Reese, Quality Assurance Engineer, Westinghouse

NRC Personnel

- \*W. G. Guldemond, Chief, Wolf Creek Resident Program
- \*H. F. Bundy, Resident Inspector
- \*K. A. Whittlesey, Reactor Inspector
- \*J. I. Tapia, Reactor Inspector

In addition, the inspectors held discussions with other members of the licensee's operations, startup, and technical support organizations.

\*The above identified personnel attended the exit meeting held on December 17, 1984.

### 2. Licensee Actions on Previous Inspection Findings

(Closed) Open Item (482/8449-03): This item tracked licensee response to NRC comments on Administrative Procedures ADM 01-001, 002, and 003. The licensee adequately resolved these comments on December 3, 1984.

(Closed) Open Items (482/8449-06 and 8449-07): These items tracked licensee response to NRC comments on Procedures STS-AL-103, STS-CR-001, and STS-EJ-001. The licensee has resolved the comments to the inspector's satisfaction.

(Closed) Open Item (482/8449-02): This item tracked licensee response to NRC comments on Procedure SU3-JE01. The licensee has resolved the comments to the inspector's satisfaction.

(Closed) SER Item (482/84-00-137): This item required NRC review of auxiliary feedwater pump 48-hour endurance run test results. Review of these results is documented in NRC Inspection Report 482/84-38.

(Closed) Unresolved Item (482/8338-04): This item identified a lack of procedures for the Plant Safety Review Committee (PSRC). The licensee has issued Administrative Procedure ADM 01-002 which adequately addresses concerns in this area.

(Closed) Violation (482/8339-01): This item documented a failure on the part of the licensee to comply with material preservation and equipment protection procedures. In response to this item of noncompliance, the licensee corrected the specific deficiencies identified and conducted retraining of affected personnel on procedural requirements.

(Closed) Deviation (482/8333-01): This deviation identified that Administrative Procedure ADM 14-202 incorrectly identified the Superintendent of Regulatory, Quality, and Administrative Services as Chairman of the Joint Test Group (JTG) contrary to Final Safety Analysis Report (FSAR) Section 14.2.3.2. Since issuance of the Notice of Deviation, the licensee has cancelled ADM 14-202 and incorporated JTG functions and organization into ADM 01-002. This procedure correctly identified the JTG chairman as the Superintendent of Operations.

The following SER Open Items have been reviewed by NRR, found acceptably resolved, and are closed. Documentation of this review will appear in a future Supplement Safety Evaluation Report.

84-00-03 - Evaluation of Main Dam Seepage 84-00-06 - Onsite Audit to Assess the Adequacy of the SQRT Program

84-00-11	- Staff Audit of Installation and Arrangement of Electrical Equipment	
84-00-80	- Adequacy of Fire Protection of	
84-00-81	Transformers XNB01 and XNB02 - Resolve Reliability of Load Sequencer	
84-00-84	<ul> <li>for On and Off Site Power</li> <li>Staff Review of the Applicant's</li> </ul>	
84-00-88	Submittal on PORV and Block Valves - Staff Review of Mechanical Equipment	
	Qualification Files	
84-00-89	- Submittal of Mechanical Equipment Qualification Information	
84-00-92	- Submittal of Analyses for Safe Operation With Items Not Fully	
84-00-93	Environmentally Qualified - Complete Replacement or Retest of Unqualified Equipment or Justify	
84-00-121	Interim Operation	
64-00-121	<ul> <li>Staff Review of Safety System Setpoint Methodology</li> </ul>	
84-00-129	<ul> <li>Licensee Reevaluation of Electrical Penetration Assembly Protective Device Settings and Capabilities</li> </ul>	
84-00-139	- Qualification of Containment Purge Valves Prior to Their Use Above Mode 5	
84-00-141	<ul> <li>Staff Review and Approval of Inadequate Core Cooling Emergency Procedures and Control Room Display Prior to License Issuance</li> </ul>	

The following SER Open Items have been reviewed by NRR and will be included as license conditions. As such, these items are considered closed.

•	84-00-07	-	Submittal on Environmental Qualification Status
•	84-00-66	-	Establish a Regulatory Guide 1.97 Implementation Schedule

(Closed) SER Item (482/8400-73): This item required the licensee to perform an annual independent review of its emergency preparedness program and report the results to the NRC. This review, to be performed by the Nuclear Safety Review Committee, is required by Procedures EPP 02-1.1, Revision 1, step 4.5.4.

(Closed) SER Item (482/8400-74): This item required the licensee to update telephone numbers in emergency procedures quarterly. This is required by Procedure EPP 02-1.1, Revision 1, step 4.3.11.

(Open) Violation (482/8307-01): This Severity Level V violation documented a failure on the part of Daniel International Corporation (DIC), the Wolf Creek constructor, to have a test control program as required by 10 CFR 50, Appendix B and the licensee's Quality Assurance Manual. The inspector reviewed the actions taken by the licensee and DIC in response to this violation and based on this review could not make a determination as to whether those actions were sufficiently comprehensive. In response to inspector concerns in this area, the licensee's Quality Assurance Manager committed to have a review performed of all actions taken to date in response to this violation paying particular attention to the technical adequacy of testing performed by DIC prior to full implementation of a test control program. This item, which must be resolved before license issuance, will remain open pending inspector review and acceptance of those actions committed to by the licensee.

#### 3. IE Bulletins (IEBs) and Circulars (IECs)

(Closed) IEB (80-05): This item required licensees to evaluate, process, and holdup tank design to ensure that the design had provided for adequate features to prevent vacuum conditions and resultant tank damage. The licensee performed an evaluation of their tank designs and determined that they were adequate. Subsequently, it was discovered that the refueling water storage tank (RWST) vent was installed in other than the design configuration. By letter dated September 28, 1984, the licensee's architect/engineer reported that an evaluation of the as-installed vent configuration confirmed that it was adequate to prevent vacuum formation.

(Closed) IEC (81-08): This IEC directed licensees to take certain steps in response to excessive building settlement observed at some reactor facilities. The licensee has implemented a program to measure building settlement. Data taken to date indicate that settlement is within allowable values and in reasonable agreement with projected values.

(Closed) IEC (79-08): This IEC transmitted information relative to attempted extortion at a uranium enrichment facility. It required no action of licensees. The inspector verified that the IEC was received and reviewed for applicability.

(Closed) IEC (80-25): This IEC required certain actions of radiographic licensees and as such is not applicable to Wolf Creek.

(Closed) IEC (78-13): This IEC documented an instance in which service water was lost at an operating facility due to a combination of siltation, low water level, and ice formation. All three causal factor were considered in the design of the Wolf Creek Service Water System. Additionally, the Service Water System Startup Procedure STS EA-120 contains steps specifying minimum water level for operation and requiring warming line operation whenever lake temperature falls below 40° F.

(Closed) IEB (84-03): This IEB described a refueling water cavity seal failure at the Haddem Neck facility and directed licensees to evaluate the potential for and consequences of such failure at their facilities. With respect to potential for a similar failure at Wolf Creek, it was determined that the Wolf Creek seal design is sufficiently different such that failure is unlikely. Specifically, the seal design incorporates alignment features which preclude mispositioning the seal. With respect to consequences, the Wolf Creek design is such that, even with a catastrophic seal failure and no operator action, all fuel in the reactor vessel, in the spent fuel pit, in the transfer tube, in the fuel upender, and in the rod control cluster assembly change fixture would remain under water. Off Normal Procedure OFN 00-018, "Fuel Handling Accident," addresses seal failure and directs operators to place fuel in transit to or from the reactor vessel in a safe location. This procedure also directs operator actions to minimize the loss of water inventory from the spent fuel pool. Based on this combination of design and procedural requirements, the issues identified in IEB 84-03 are considered resolved for Wolf Creek.

(Closed) IEC's (79-09 and 79-15): These IECs described deficiencies with certain emergency breathing devices. The type of devices described are not employed at Wolf Creek.

(Closed) IEC (80-14): This IEC described a situation in which a plant demineralized water system (DWS) became contaminated by temporary cross connection to a radioactive system. The designs of the DWS and portable water system at Wolf Creek are such that a similar event is not expected to occur.

(Closed) IEC (80-10): This IEC describes a situation in which maintenance activities compromised the environmental qualification of safety-related equipment. The licensee currently has in place Administrative Procedure ADM 08-202 which requires the identification of environmentally qualified (EQ) equipment prior to maintenance. The licensee's managed maintenance system also identifies EQ components. These provisions are such that a similar event should not occur at Wolf Creek.

(Closed) IEB (76-01): This IEB addresses BWR isolation condenser tube failures and as such is not applicable to Wolf Creek.

(Closed) IEB (76-02): This IEB addresses failures of certain GE relays with nylon spools. A relay inspection at Wolf Creek performed in response to IEB 84-02 identified no relays with nylon spools.

(Closed) IEC (78-02): This IEC described a situation in which an improper lubricant was used in a safety-related component due to a failure to periodically review the lubrication schedule. Administrative Procedure ADM 08-208 requires the maintenance department to periodically review the lubrication schedule.

(Closed) IECs (78-17 and 79-03): These IECs documented deficiencies in security guard training/qualification and training records. These areas are now part of the NRC routine inspection program, and the licensee's security training program was evaluated during the licensing review process.

(Closed) IEC (79-02): This IEC documented failure of vital 120 volt AC power supplies. The issues identified therein were addressed during the licensing review process as documented in a February 2, 1984, letter from the Standardized Nuclear Unit Power Plant Systems (SNUPPS) organization to NRR.

(Closed) IEC (79-20): This IEC documented failures of certain GTE Sylvania relays due to operating rod notching. The subject relays are not used in safety-related applications at Wolf Creek.

(Closed) IEC (79-22): This IEC describes a failure of power operated relief valves (PORVs) to satisfactorily stroke when called upon to do so and recommends licensees review existing surveillance requirements for adequacy. Technical Specification 4.4.4.1 prescribes adequate periodic stroke time testing for the Wolf Creek PORVs.

(Closed) IEC (80-04): This IEC describes several situations in which safety-related equipment became inoperable due to loosened threaded fasteners. This issue is addressed at Wolf Creek by incorporating vendor manual locking device requirements into maintenance procedures and by requiring quality control inspections for locking device installation per ADM 11-006.

(Closed) IEC (81-09): This IEC describes a situation in which a portion of cooling water serving containment components was not monitored for radioactivity upon leaving containment. The Wolf Creek design is such that all effluent pathways are monitored.

#### 4. 10 CFR 50.55(e) Reports

During the inspection period the following reports submitted pursuant to 10 CFR 50.55(e) were reviewed. Licensee actions as described below were adequate to resolve the reported issues and these reports are considered closed.

#### a. Diesel Generator Lube Oil Keep Warm Pump TE53564-K126

This report documented repeated failures of the Crane-Deming ASME Section III, Class 3 diesel generator lube oil keep warm pumps. As a result of these failures the licensee replaced the suspect pump with Viking pumps originally provided by the diesel vendor. The Viking pumps are not ASME Section III, Class 3 pumps and as such do not satisfy the licensee's design commitment; however, the pumps have proven reliable and are similar in design to seismically qualified pumps from the same model line. The licensee has proposed using the Viking pumps on an interim basis until fully qualified replacements can be obtained. This proposed action is sufficient to close the 50.55(e) report; however, as it represents a deviation from design commitments, approval of the Office of Nuclear Reactor Regulation (NRR) must be obtained prior to license issuance. Receipt of this approval will be tracked as an open item. (50-482/8455-01)

#### b. Incore Thermocouples TE53564-K149

This report documented discovery of damaged incore thermocouple connectors. The licensee has committed to replace the existing connectors with new connectors prior to fuel load. This commitment is satisfactory to close this item. Replacement of the connectors will be tracked as an open item which must be closed prior to fuel load. (50-482/8455-02)

## c. Pipe Whip Restraints TE55980-K026

This report documented design errors on certain pipe whip restraints. These restraints employ either U-bolts or energy absorbing material as the restraining component. All such restraints were reviewed for applicability of the error. One hundred three of two hundred forty-two restraints were identified as potentially deficient. All discrepancies were resolved by a combination of rework, redesign, or reanalysis.

## d. TMI Lead Auditor TE53564-K139

This report documented inadequate qualifications of a designated lead auditor who performs audits of insulation contractors. In response to this finding, the licensee reaudited the insulation contractors. Identified deficiencies were appropriately dispositioned.

#### e. Pressurizer Power Operated Relief Valves TE53564-K155

This report documented a failure of the pressurizer power operated relief valves (PORVs) to close following a 200 psig blowdown. The licensee has evaluated the failure with the valve manufacturer and the NSSS supplier and arrived at modifications which are expected to solve the blowdown problem. Completion of the modifications is documented in Construction Work Permit BB-892-I. These actions are sufficient to permit closure of this report; however, post modification testing has not been performed. The licensee has requested NRR approval to defer this testing until after initial fuel loading but prior co initial criticality. Resolution of this deferral request will be tracked as an unresolved item (482/8455-03) which must be closed prior to fuel load. Completion of the post modification testing will be tracked as an open item (482/8455-04) which must be closed prior to fuel loading or initial criticality as appropriate.

## f. Westinghouse 7300 Process Racks TE55780-K34

This report documented certain failures in the solid state reactor protection system. The licensee, with Westinghouse, has developed a design change involving installation of a jumper and use of a special test card to facilitate surveillance testing. These actions are sufficient to allow closure of this item. Implementation of the design changes will be tracked as an open item which must be closed prior to fuel load. (482/8455-05)

#### g. Lube Oil Piping System TE53564-K147

This report documented a failure on the part of the licensee to control safety injection pump and charging pump lube oil system modifications and flushing as safety-related activities. In response to this failure the licensee committed to evaluate and reperform these activities as required prior to fuel loading. This commitment is adequate to allow closure of this report. Completion of the committed-to activities will be tracked as an open item which must be closed prior to fuel load. (482/8455-08)

## h. Fan Mechanical Interlocks TE53564-K128

This report documented periodic failures of the contact assembly which causes the shift of containment cooling fans from high to low speed on the receipt of a safety injection signal. The failures were caused by excessive length of the extender arm on the interlock assembly. The extender arms will, with vendor approval, been shortened by 48 inches to resolve this problem. This will be tracked as an open item. (482/8455-07)

i. <u>Reactor Coolant System (RCS) Resistance Temperature Detector (^TD)</u> Calibration Data TE53564-K148

This report documented anomalies in RCS RTD performance during hot functional festing due to questionable calibration data. The licensee has committed to replace the RTD's with properly calibrated RTD's prior to fuel load. This will be tracked as an open item which must be closed prior to fuel load. (482/8455-06)

# j. Limitorque SB-2-80 Actuator Gear Damage TE53564-K146

This report documented a series of failures experienced on Limitorque Model SB-2-80 valve operators. In response to these failures the licensee committed to replace all SB-2-80 operators with SB-1-60 operators. Completion of this commitment will be tracked as an open item (482/8455-09) which must be closed prior to fuel load.

## k. Pipe Schedule TE53564-K116

This report documented a case in which duplicate heat numbers were inappropriately transcribed to two different schedules of pipe. As a result of this discovery the licensee performed a reinspection of all installations involving the suspect piping. Two deficient piping spool pieces were identified and replaced.

# 1. Excore Neuton Detectors TE53564-K154

This report documented thermal damage to source range detector cabling due to a failure to install the entire length of cabling in conduit as required and removal of insulation. The insulation has been replaced. The licensee has committed to replace the affected detector and cabling prior to fuel load. This will be tracked as an open item. (482/8455-10)

# 5. Preoperational Test Procedure Review

During the inspection period, the NRC inspector performed detailed reviews of the following preoperational test procedures:

- SU3-GP01 Primary Reactor Containment Intergrated Leakage Rate Test (ILRT)
- SU3-GP02 Structural Integrity Test

These reviews were performed to assess technical and administrative adequacy and conformance to regulatory requirements of the referenced procedures. As a result of these reviews the following comments were generated:

a. SU3 GP01

(1) The containment temperature stabilization criterion contained in the procedure is not in strict conformance with the criteria contained in the referenced BN-TOP-1, "Testing Criteria For Intergrated Leakage Rate Testing of Primary Containment Structures For Nuclear Power Plants," Revision 1, November 1, 1972. In response to this comment, the licensee agreed to verify conformance with the BN-TOP-1 criteria before taking credit for a short duration test. (2) Acceptance Criteria 2.2.4 and 2.5.4 of the subject test state that, "The mean of the measured leakage rates based on total time calculations over the last five hours of the test or the last twenty data points, whichever provides the most data, shall be less than La  $(L_{+})$  ...." 10 CFR 50, Appendix J, Section III.A.4 requires measured leakage to be less than 75% of the maximum allowable leakage for a successful test. In response to this comment, the licensee committed to change the acceptance criteria to reflect Appendix J requirements.

It should be noted that other acceptance criteria in SU3-GPO1 did reflect Appendix J requirements and would have guaranteed conformance to the 75 per cent of maximum allowable leakage criterion. Further, Steps 2.2.4 and 2.5.4 were worded exactly as contained in the NRC-Approved BN-TOP-1. As such, this apparent technical inadequacy in SU3-GPO1 is not considered to be an item of noncompliance.

(3) Steps 7.3.5 and 7.5.5 require a post ILRT verification test of greater than or equal to four hours. While this is acceptable for an ILRT of at least 24-hour duration, it is not acceptable for an ILRT of shorter duration. BN-TOP-1 requires that the post ILRT verification test duration be approximately on-half the duration of the ILRT. In response to this comment, the licensee agreed to conduct their post ILRT verification test in accordance with BN-TOP-1 if the ILRT duration was less than 24 hours.

(4) Steps 7.3.3 and 7.5.3 allowed the licensee to take credit for the last four hours of the ILRT to satisfy post ILRT verification stabilization criteria. BN-TOP-1 requires a stabilization period of approximately one hour after inducing a superimposed leak for the verification test prior to beginning the verification test. In response to this comment the licensee agreed to satisfy the verification stabilization criteria of BN-TOP-1.

(5) The instrument list in Appendix C to SU3-GPO1 contained no accuracy specification for the dew point cells. In response to this comment, the licensee agreed to change Appendix C to incorporate the accuracy specifications.

(6) Paragraph 2.2.C of BN-TOP-1 specifies that unless certain dew point stabilization conditions are met, at least two-thirds of the dew point sensors must remain operable throughout the ILRT and verification. SU3-GPO1 contained no dew point stabilization criteria and allowed up to 3 of 6 dew point sensors to be inoperable. In response to this comment, the licensee committed to change their procedure to require at least 4 operable dew point sensors if ILRT duration was to be less than 24 hours.

## b. SU3-GP02

(1) The approved Revision 0 of this procedure referenced Regulatory Guide 1.136, Revision 2 in step 3.3.1. Comparison of SU3-GP02 to the specifications contained in Regulatory Guide 1.136 revealed numerous discrepancies including inadequate radial and vertical deflection instrumentation, no acceptance criteria for local damage/deformation, and no acceptance criteria for postdepressurization relaxation. Following review of these comments the licensee determined that they had committed in the FSAR to perform the structural integrity test (SIT) in accordance with Regulatory Guide 1.18, Revision 1 with exceptions rather than Regulatory Guide 1.136. It was found that SU3-GP02 did conform to the committed-to reference with the stated exceptions. The licensee agreed to correct the step 3.3.1 reference.

(2) The procedure as written called for no quality control (QC) witnessing of crack inspections. In response to this comment the licensee agreed to incorporate QC witnessing of crack inspections into the procedure.

In summary, reviews of SU3-GP01 and SU3-GP02 revealed numerous deficiencies in incorporation of technical requirements contained in referenced documents. In the case of SU3-GP01, those deficiencies were such that the test could have been invalidated.

The licensee was very responsive to NRC inspector comments on these procedures; however, the number and nature of the comments is indicative of basic weakness in the licencee's procedure preparation and review process. This weakness was one subject of a recent enforcement conference on preoperational test program deficiencies. In response to that Enforcement Conference, the licensee initiated a series of corrective actions, one of which was a review of all properational tests for incorporation of FSAR commitments, Regulatory Guide requirements, and other references. It is only because that corrective action program is still in progress that the above noted deficiencies are not currently considered for enforcement action; however, continued existence of weaknesses of the type noted above will be viewed as a failure to take prompt and effective corrective action in response to NRC identified weaknesses and will be the subject of enforcement action.

In addition to the procedures referenced above, reviews were also conducted of SU3-BB15A, "Reactor Coolant System Leak Rate," SU3-BB15B, "Leak Detection System," and STS BB-004, "RCS Water Inventory Balance." While all three procedures were found to be adequate, it was noted that the constants used in the SU3 procedures for gallons of leakage versus measured plant parameters were different than those used in the STS procedure. This was brought to the attention of the licensee who was still investigating the discrepancy at the close of the inspection period. Resolution of this discrepancy will be tracked as an open item which must be closed prior to fuel load. (482/8455-11) No violations or deviations were identified.

### 6. Preoperational Test Activities

The NRC inspector reviewed data and observed portions of the following preoperational tests:

- . SU3-EP01 Accumulator Safety Injection
- . SU3-NEO1 Diesel Generator Electrical
- . SU3-SA03 Engineered Safeguards Verification Test

The tests were performed and documented per test and administrative procedural requirements; however, the NRC inspector was concerned with the large number of changes required in the checklists supporting SU3-SA03. Almost every checklist required changes; e.g., Checklist GG-131 required changing five items.

It was observed that the auxiliary feedwater B train components were not actuated when the push button was depressed in step 7.2.8 of SU3-SA03. This was proven to have been caused by a mechanical binding in the switch. The licensee should analyze this problem for possible generic problems and to determine that it will not occur again for this particular switch. This will be tracked as an open item. (482/8455-12)

A full load trip of A diesel generator in step 7.3.46 of SU3-NEO1 satisfied test requirements.

No violations or deviations were identified.

#### 7. Plant Tours

Throughout the inspection period the NRC inspectors toured the plant to make an independent assessment of equipment conditions, plant conditions, security, and adherence to regulatory requirements. The following observations were made:

- Plant cleanliness has shown drastic improvement and is now acceptable for plant operations.
- b. Access control implementation is marginally satisfactory. Numerous instances were noted where badge sequencing errors were made with escorted visitors. Also, access to the auxiliary building has yet to be controlled through the normal access point.

The NRC inspector observed a shift turnover for the reactor operator assignment. The proper checklists were completed and sufficient information was communicated to provide an adequate turnover.

No violations or deviations were identified.

# 8. Maintenance Activities

The NRC inspector observed portions of the work involved in replacement of threads for the bolts to the primary hot leg manway on steam generator D. Several bolts were found to be seized when an attempt was made to remove the manway cover for an inspection. The NRC inspector audite the following:

- . Proper authorization of the work
- . Qualifications of technicians performing the work
- Adequacy of work procedures
- Performance of work in accordance with approved procedures
- . Quality documentation

The work was performed in accordance with a work plan (Work Order 53) generated in accordance with licensee Administrative Procedure ADM 01-036. It incorporated Westinghouse Procedure SSS 2.7.2, GEN-48, Revision 2. The work procedure was adequate and the work observed was properly performed, documented, and approved. Qualification records on the procedure were available for the Westinghouse technicians performing the work.

The NRC inspector also observed portions of work on "A" charging pump shaft replacement which was performed in accordance with Wolf Creek Work Request 90729-84, Revision 9. Pump Manual M-721-0093 procedures were incorporated. Also utilized were Plant Procedures MGM-MOOP-08, "Torquing of Bolted Flanges," and MGM-MOOC-04, "Alignment of Rotating Equipment." The work observed was properly performed per the procedures and properly witnessed by a QC representative.

No violations or deviations were identified.

# 9. Emergency Procedures

The NRC inspector reviewed the following emergency operating procedures for technical content, format, and approvals:

	EMG C-O, Rev. O - Loss of All AC Power
	EMG C-12, Rev. O - LOCA Outside Containment
	EMG E-O, Rev. O - Safety Injection
	EMG E-3, Rev. 0 - Steam Generator Tube Rupture
	EMG FS-02, Rev. 0 - Reactor Trip Response
	EMG ES-03, Rev. 0 - SI Termination
•	MG ES-05, Rev. 0 - Natural Circ. Cooldown W/Steam
•	EMG FR-C1, Rev. 0 - Response to Inadequate core
•	EMG FR-I3, Rev. 0 - Response to Void in the
•	Reactor Vessel EMG FR-Z1, Rev. 0 - Response to High Containment
	OFN 00-001, Rev. 0 - Load Rejection

No significant deficiencies were identified; however, it was noted that each procedure has a deficiency list attached which must be reviewed by the licensee prior to implementation of the procedure.

No violations or deviations were identified.

## 10. Event Followup

The NRC inspector reviewed Wolf Creek Event Report 84-118 to determine:

- . Adequacy of response
- . Adequacy of analysis to determine cause
- Adequacy of corrective actions to prevent recurrence

The report was adequate.

No violations or deviations were identified.

# 11. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. Open items disclosed during the inspection are discussed in paragraphs 4 (8 items), 5, and 6.

# 12. Unresolved Items

An unresolved item is a matter about which more information is required in order to determine whether it is an acceptable item, a violation, or a deviation. Two unresolved items are discussed in paragraph 4 of this report.

# 13. Exit Meetings

The NRC inspectors met with licensee personnel to discuss the scope and findings of this inspection on December 17, 1984. They also attended exit meetings conducted by other NRC inspectors.