APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-482/84-12 Construction Permit: CPPR-147

Docket: 50-482 Category: A2

Licensee: Kansas Gas and Electric Company
P. O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station (WCGS), Unit 1

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

Inspection Conducted: May 14-August 31, 1984

Inspectors: L. D. Gilbert, Reactor Inspector, Task Force — Date 9/17/84

R. G. Taylor, Reactor Inspector, Task Force — Date 9/17/84

Consultants: D. Baxter and H. Stromberg, EG&G

Approved: L. E. Martin, Chief, Task Force — Date 9/27/84

Inspection Summary

Inspection Conducted May 14-August 31, 1984 (Report 50-482/84-12)

Areas Inspected: Routine, unannounced inspection of activities including: followup to allegations, installation of electrical equipment, licensee action on 10 CFR 50.55(e) items, licensee actions on IE Bulletins, and licensee actions regarding allegations. The inspection involved 52 inspector-hours in office and 294 inspector-hours onsite by two NRC inspectors and two NRC consultants.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Principal Licensee Employees

*R. M. Grant, Director - Quality
*W. J. Rudolph, Manager Quality Assurance (QA), WCGS
*W. M. Lindsay, Quality Systems Supervisor

The NRC inspectors also interviewed other licensee and contractor personnel.

*Denotes those attending the exit interviews.

2. Followup to Allegations (4-84-A-08)

a. Allegation No. 1

Allegation: "My . . . concern involving Wolf Creek involves potential quality problems that should have been directed to Quality Engineering for a response, but were short circuited by DI supervisor . . . . I am attaching six three-part memorandums, Attachments (4-9), which will clarify my concern."

Investigation: The project quality engineer (PQE) was requested to state management's policy regarding response to requests from quality inspectors for clarification of inspection requirements. The PQE stated that the discipline quality supervisor (DQS) was responsible for assisting his inspectors in the interpretation of inspection requirements. Therefore, at the suggestion of the PQE, the DQSs had previously been instructed by management to respond to their inspectors' requests for clarification of inspection requirements, unless the DQS agreed that quality engineering should clarify the inspection requirements. In which case, the DQS was instructed to initial the three-part memorandum and forward it to quality engineering. The DQS stated in an interview that it was his responsibility to assist inspectors in interpreting inspection requirements or forward the request for clarification to the PQE.

The NRC inspector reviewed the six memoranda (including NCR 1SN 8296 PW) and discussed the technical issues of each with the Daniel International Corporation (DIC) PQE and the project mechanical manager (PMM). The responses given by both managers were consistent with the response given by the DQS to the six three-part memorandums.

Conclusion: Based on the above investigative findings, it is concluded that the three-part memorandums were properly dispositioned and the actions taken by the DQS were consistent with management policy. On this basis the allegation is substantiated; however, it has no technical or safety significance.

b. Allegation No. 2

Allegation: " . . . a surveillance report . . . required by AP-VI-14 . . . was closed-out by . . . with a message, 'See attached memo'. This type of answer violates surveillance procedure. I am enclosing Attachment (10), which is a memorandum . . . to Quality Engineering, and Attachment (11), which is a Quality Surveillance Report . . . I am also enclosing Attachment (12), which is a Quality Surveillance Report . . . . These documents should help clarify my concerns of this issue."

Investigation: The NRC inspector reviewed the memorandum and two quality surveillance reports (SRs). The subject of the memorandum and the SR referred to as Attachments (10) and (11) are the same. The memorandum provided clarification for the application of Procedure QCP-VIII-200. The PQE and PMM both agreed that the clarification provided by the memorandum was the correct application of the procedure.

The technical issue of the second SR referred to as Attachment (12) was also discussed with the PQE. After reviewing the referenced traveler and procedure, it was determined that the discrepancy stated in the proposed SR was not valid because the traveler had been issued to only repair specific welds on a vendor-supplied support. Therefore, a Bill of Material (BOM) was not included in the traveler which is consistent with Procedure WP-VIII-202.

In reviewing Procedure AP-VI-14, it was noted that the DQS is responsible for reviewing SRs and if incorrectly initiated, the DQS is to return the SR and provide further instruction for inspector action. During an interview, the DQS stated that he discusses each incorrectly initiated SR with the inspector and provides direction for further action.

Conclusion: Based on the above investigative findings, it is concluded that the action taken on the two SRs by the DQS was consistent with Procedure AP-VI-14 for supervisory responsibility. On this basis, the allegation could not be substantiated.

c. Allegation No. 3

Allegation: "My . . . concern involving Wolf Creek relates to an incident in which vendor spools were cut in half prior to inspections by Quality Control. The traceability of metals was lost because these spools were cut in half prior to inspection. I am enclosing Attachment (13), which is a Quality Surveillance Report . . . to help clarify this technical issue."

Investigation: The NRC inspector reviewed the SR and referenced drawing, IM-03BB03 ECR8. The pipe spool which was cut is in a nonsafety-related solid radwaste system. The drawing had been

annotated with a note from a Level II quality inspector which stated, "Witnessed and verified markings after cutting. Vendor pieces are matched flanges and are obviously from the original spool S022."

Conclusion: Based on the above investigative findings, it is concluded that the nonsafety-related pipe spool material traceability markings were verified after cutting it in half. On this basis, the allegation, in part, was substantiated; however, it has no safety significance.

d. Allegation No. 4

Allegation: "My . . . concern involving Wolf Creek is in the way that changes to the NDE tags on site were processed. I feel that the way it is currently handled violates AP-VI-05, which is a procedure which involves NDE subcontractors. I am enclosing Attachment (14), which is a report entitled Processing of NDE Reports. This attachment should clarify my technical concerns of this issue."

Investigation: The NRC inspector reviewed the attachment and procedure. The contents of both documents were discussed with the PQE and project quality inspection manager (PQIM), the PQIM stated that he had prepared a summary of the procedure to assist inspectors in processing NDE reports.

After a detailed review of the summary sheet and Procedure AP-VI-05, it was determined that a minor change did exist for processing the NDE request tag. The difference was that the procedure required the pink copy to be sent to the quality supervisor before performing NDE. Whereas the summary sheet specified that the pink copy and completed NDE report were to be sent to the quality supervisor after performing the NDE. The PQE stated that the change had no significance but agreed to incorporate the change into the next revision of Procedure AP-VI-05.

Conclusion: Based on the above investigative findings, it is concluded that a minor change had been made for processing copies of the NDE request tag without revising the administrative procedure. On this basis, the allegation is substantiated; however, it has no technical or safety significance.

e. Allegation No. 5

Allegation: "My . . . concern involving Wolf Creek is a problem with generic NCR reports. I feel that the current Procedure AP-VI-02 does not contain any requirements that would properly document generic NCRs. I am enclosing Attachment (15), which is a six-page document titled Generic References, which should help clarify this technical issue."

Investigation: The NRC inspector reviewed the generic nonconformance reports (NCRs) referenced in the attachment and determined that the NCRs were issued to identify specific documentation errors. These NCRs were designated generic and provided disposition of all such nonconformances found during subsequent documentation review. In each case, the disposition of the generic NCR was "use-as-is." The procedure for nonconformance control and reporting, Procedure AP-VI-02, provides general direction for preparing NCRs. The procedure neither specifies that generic NCRs may be used nor does it specify any limiting factors which would prohibit the use of generic NCRs.

Conclusion: Based on the above investigative findings, it is concluded that, although Procedure AP-VI-02 does not specifically address the use of NCRs for generic applications, the generic NCRs were consistent with requirements of Procedure AP-VI-02 for nonconformance control and reporting and the NCR disposition was appropriate. On this basis, the allegation, in part, was substantiated; however, it has no technical or safety significance.

f. Allegation No. 6

Allegation: "My . . . concern involving Wolf Creek relates to the improper documentation involving the heat number on a piece of traceable metal to be welded to a valve. I do not feel that supervisor . . . adequately handled this documentation. I am enclosing Attachment (16), my notes, which will give more detail to this concern."

Investigation: The NRC inspector reviewed the notes; the alleger said that the heat number for a piece welded to a valve on Drawing PM03GS03(Q)01 had been changed on October 7, 1983, from BZD28 to BZD28X, on a copy of the BOM which had been voided on May 12, 1983.

A review of the traveler for Drawing PM03GS03(Q)01 identified piece 533 as the only material with heat number BZD28X on the BOM voided on May 12, 1983. The heat number had been entered on the BOM for piece 533 on March 28, 1983, and looked more like B1D28X than BZD28X. The heat number was lined out; initialed; and dated on October 7, 1983, with an asterisk to the remarks section where the heat number was rewritten as BZD28X. The words, "Rewritten for clarity," were written after the rewritten heat number. A later revision of the BOM, Revision 2, also contained a notation for the heat number of piece 533. The note said, "Reverified HT#BZD28X," and was initialed and dated on October 7, 1983, by a Level II inspector.

The heat number on the original BOM appears to have been made with the same pen, including the letter "X."

The NRC inspector interviewed the Level II QC inspector that verified the original heat number for piece 533, who stated that the heat number, as originally written on the BOM, was hard to read but agreed that it should be read as BZD28X.

Another Level II QC inspector was interviewed who stated that he remembered performing a fitup inspection on weld FW 533 but did not accept the fitup because the heat number on the BOM did not exactly match the heat number on pipe piece 533. He could not remember whether it was the "BZD" or the "28X" of the heat number that did not match. He said that he was not requested to reinspect the fitup and did not know if it had been corrected.

The NRC inspector also interviewed the Level II QC inspector that accepted the fitup of weld FW 533 who said that he reverified the heat number on FW 533, but could not recall why he reverified it. He stated that part of the heat number on the pipe could have been removed when buffing the pipe but since the heat number had been recorded on the BOM by the Level II inspector, it was acceptable to have the "X" remarked on the pipe which he may have done.

The DQS was interviewed and stated that he rewrote, for clarity, the heat number on the BOM based on a review of the Heat Number Cross Reference Report and the Level II QC inspector's original acceptance of the heat number.

The NRC inspector observed the pipe designated piece 533 on Drawing PM03GS03(Q)01 and noted that the "28X" was visible on the pipe. The certified material test report for heat number BZD28X was viewed and found to be consistent with the material requirements for piece 533.

Conclusion: Based on the above investigative findings, it is concluded that the heat number was reverified and properly corrected. On this basis, the allegation could not be substantiated.

g. Allegation No. 7

Allegation: "My . . . concern involving Wolf Creek involves the use of small hanger parts (load pin and conical washers). I feel that these parts were not tagged in accordance with procedural requirements. I am enclosing Attachment (17), a Quality Surveillance Report . . . , and Attachment (18), which are my notes concerning the issue, as documentation that should clarify this technical issue."

Investigation: The NRC inspector reviewed the SR and notes provided in the attachments. The engineering response to the SR stated that certain hanger parts, such as conical washers, cotter pins, and spacers are exempt from traceability requirements and referenced ASME Code System NF 2121. The response further stated that until load

pins are issued for a particular hanger, no deficiency exists. At time of issuance, pins shall be bagged and tagged in presence of Quality and when pins are installed in hanger, Quality shall witness unbagging. The procedure for fabrication and installation of component supports, WP-VII-208, was revised January 22, 1984, to be consistent with the clarification provided as a response to the SR.

The NRC inspector toured the load pin storage areas and observed that the load pins were segregated and stored in bins which were labeled with identifying markings. The DIC materials engineer responsible for load pin storage and issuance stated that all safety-related hangers were being reinspected under Corrective Action Report 1-G-0025; all unmarked small load pins were being replaced; and quality inspectors were witnessing the bagging, tagging, and unbagging of the replacement load pins.

Conclusion: Based on the above investigative findings, it is concluded that the problem related to questionable material traceability for small hanger parts identified by quality personnel was properly dispositioned by quality engineering. On this basis, the allegation is substantiated; however, it has been previously addressed by procedural change and a reinspection program.

h. Allegation No. 8

Allegation: "My . . . concern involving Wolf Creek deals with Nonconformance Report No. 1SN12865P. This NCR was voided because it was felt that this inspection was beyond the normal scope of a quality inspector activities. I am enclosing Attachment (19), which is Nonconformance Report No. 1SN12865P. The details reported in NCR should clarify my concern on improper voiding of nonconformance reports. I am also enclosing Attachment (21), which is an inter-office memorandum dated August 20, 1983."

Investigation: The NRC inspector reviewed NCR 1SN12865P and discussed it with the PQE. The NCR identifies two Corrective Action Reports (CARs) that were not signed by the authorized nuclear inspector (ANI) and another CAR that was written on an uncontrolled form. The PQE stated that this type of review is normally performed by auditors and the quality inspector took inappropriate action by applying hold tags to the CARs. Therefore, in order to remove the hold tags, a new NCR was issued by quality engineering which incorporated the discrepancies identified in NCR 1SN12865P. The new NCR was numbered 1SN12920P and was issued on August 24, 1983. The PQIM voided NCR 1SN12865P on August 25, 1983, with a clarifying note and a reference to NCR 1SN12920P. The disposition of NCR 1SN12920P is considered to be appropriate and has been completed.

The NRC inspector also reviewed the inter-office communication (IOC) referred to as Attachment (21) and discussed it with engineering. The IOC stated that CAR-25 would be revised to address the concerns

of Stop Work Action P/W-001 and the revision would be implemented as a retrofit reinspection for all supports except for those exempt from the stop work. CAR-25 was revised as stated in the IOC and issued as Revision 6 on January 23, 1984.

Conclusion: Based on the above investigative findings, it is concluded that the NCRs were properly dispositioned and the IOC was only a prenotification that CAR-25 would be revised. On this basis, the allegation, in part, was substantiated; however, it has no safety significance.

i. Allegation No. 9

Allegation: "My . . . concern involving Wolf Creek deals with the problem of using correcting ribbon on a typewriter to make corrections of noncomformance reports. I feel this does not meet procedure, and I am enclosing Attachment (22), a memorandum dated July 14, 1983, to address these concerns."

Investigation: The NRC inspector reviewed the memo and discussed it with the PQE. The subject of the memo is "Clerical Errors on NCRs." The procedure for nonconformance control and reporting is AP-VI-02 and the PQE is responsible for originating this administrative procedure. Since the procedure does not address making corrections to an NCR until after it has been signed by the originator, the PQE concurred with the PQIM's interpretation that it is not a discrepancy to use correcting ribbon on a typewriter to make a correction on an NCR during the normal processing cycle. The memo further states that the use of correct-type (tape-over) is prohibited.

Conclusion: Based on the above investigative findings, it is concluded that the interpretation provided by the memo to clarify the intent of Procedure AP-VI-02 was within the administrative responsibility of the PQE and did not conflict with the requirements of the procedure. On this basis, the allegation could not be substantiated.

j. Allegation No. 10

Allegation: "My . . . concern involving Wolf Creek deals with the improper use of Surveillance Reports. I am enclosing Attachment (23), which are my notes on this generic problem. These notes should help verify my concerns involving improper use of Surveillance Reports. I am also enclosing Attachment (24), which is a Quality Surveillance Report . . . which has not been properly handled . . . Attachment (25), which is a Quality Surveillance Report that has not been properly handled. All these documents should help clarify my technical concerns on the improper use of Quality Surveillance Reports."

Investigation: The NRC inspector reviewed the notes and two SRs which were provided as Attachments (23), (24), and (25). The notes were excerpts from the administrative procedure for Quality Surveillance Reports, Procedure AP-VI-14. Paragraph 4.2 of the procedure requires the DQS to review the SR for adequacy of description and compliance with AP-VI-14. The procedure further states that if the SR is incorrectly initiated or unclear, return that SR to the quality inspector for correction and resubmittal, or provide further instruction for inspector action. The DQS returned the SRs and provided further instruction for inspector action.

Conclusion: Based on the above investigative findings, it is concluded that the actions taken by the DQS on the SRs were consistent with Procedure AP-VI-14. On this basis, the allegation could not be substantiated.

k. Allegation No. 11

Allegation: The concern involves a wide range of generic technical problems. These problems are decisions made on technical items that the alleger does not agree with. The items of concern were identified as Attachments (26-38).

Investigation: The NRC inspector reviewed the attachments and discussed the technical issues of each item with DIC engineering and/or quality engineering. The following is a summary of each item:

The first item was an IOC which documented the quality engineering response to five questions asked by quality inspection personnel during training on Procedure QCP-VII-204, Revision 8. The responses were reviewed with QE and considered to be technically adequate.

The second item was an IOC from quality engineering and engineering technical services to quality inspection that clarified the intent of Drawing MS-25, SGN-1, Note 7, for shimming type SGN-1 hanger assemblies. The drawing specifies the SGN-1 assembly as a nonsafety-related hanger. Therefore, the clarification has no safety significance.

The third item was a three-part memo from training to quality engineering that requested clarification of the fit-up inspector certifications for NF supports. The quality engineering response was found to be appropriate and consistent with ASME Code Interpretation III-80-213.

The fourth item was a three-part memo from quality engineering to quality inspection which provided guidelines for inspecting threaded pipe joints that require seal welding. The guidelines were reviewed with QE and considered to be technically adequate.

The fifth item was a three-part memo from quality engineering to quality inspection to clarify weld length requirements. The clarification was appropriate and consistent with Note 21 of Bechtel Drawing M-060202B(Q), Revision 6.

The sixth item was a three-part memo from quality engineering in response to a request from quality inspection for guidelines on an erection tolerance for NF hangers. Acccording to the hanger engineering technical services supervisor, quality engineering incorrectly applied the tolerance specified in Appendix K of ASME Section III. A nonconformance report (NCR 1SN 19197 H) was issued to assess the significance of the discrepancy. This item will remain unresolved pending resolution of the NCR. (8412-01)

The seventh item was a three-part memo from quality engineering in response to a request from training for clarification of Procedure QCP-VII-500 for inspecting after-postweld heat treatment. The response was reviewed with quality engineering and considered to be technically adequate.

The eighth item was a three-part memo from training with a suggested clarification for paragraph 4.6 of Procedure QCP-VII-500. Although the response from quality engineering stated that the clarification would be incorporated into a future revision, the clarification has not been incorporated into the procedure. The procedure was reviewed with quality engineering and considered to be technically adequate without the clarification to the paragraph.

The ninth item was a three-part memo in which quality engineering responded to training's request for clarification of Procedure QCP-VII-500, paragraph 4.4. The procedure has been revised to eliminate the ambiguous wording of paragraph 4.4 for reviewing heat treatment request reports.

The tenth item was an IOC in which quality engineering provided guidelines for requesting engineering evaluation for oversized fillet welds. The response was reviewed with quality engineering and considered to be technically adequate.

The eleventh item was an IOC from quality engineering that clarified documentation requirements for weld buttering on special scope systems. The IOC was reviewed with quality engineering and the clarification is considered to be technically adequate.

The twelfth item was an IOC from mechanical engineering which provided direction to welding engineering for seal welding any leak paths around HVAC hangers. The technical direction provided by the IOC was appropriate and consistent with Bechtel Specifications M-618.3 and M-635.3, paragraph 5.2.2.

The thirteenth item was an IOC from quality engineering which provided direction for documenting the addition of weld metal to a completed fillet weld. The IOC was reviewed with quality engineering and considered to be technically adequate.

Conclusion: Based on the above investigative findings, it is concluded that 1 of the 13 items was improperly dispositioned by quality engineering. On this basis, the allegation, in part, is substantiated; however, the significance cannot be determined until the unresolved item in the sixth item above has been resolved.

1. Allegation No. 12

Allegation: The concern relates to an incident where material traceability was questionable for a plate welded to the reactor fuel pool wall. The alleger's notes were identified as Attachment (39).

Investigation: The NRC inspector reviewed the notes provided as Attachment (39). The notes stated that an unspecified plate, which had been welded to the reactor fuel pool wall, did not contain visible heat number markings during final inspection. The FSAR designates the reactor fuel pool liner as nonsafety-related. The Technical Specification for the reactor fuel pool wall, Bechtel Specification 10466-C171, does not require material traceability for plate welded to the reactor fuel pool wall.

The NRC inspector interviewed two QC inspectors who performed inspections on the reactor fuel pool wall. One QC inspector was not aware of any plate welded to the reactor fuel pool wall where the heat number was not visible for final inspection. The other QC inspector could only recall one instance where a shop QC inspector was requested to verify the heat number on a plate of an assembly sent to the field with the heat number not visible. Both QC inspectors stated that it was common practice to check for heat numbers but neither inspector knew of a procedural requirement to verify the heat number during final inspection of nonsafety-related material.

Conclusion: Based on the above investigative findings, it is concluded that traceability was not required for the nonsafety-related material and therefore, the heat numbers are not required to be visible. On this basis, the allegation was substantiated; however, it has no technical or safety significance.

3. Installation of Electrical Equipment

a. Review of Procedures

The NRC inspector reviewed the below-listed DIC procedures for the installation, installation inspection, and documentation of safety-related electrical components, including cable raceway

systems. As used in the list, the WP prefix indicates generic procedural direction to the installing organization and the QCP prefix denotes procedural direction to quality control personnel. Specific instructions at the individual component level have been provided by "Work Assignments," "Rework Assignments," and by "Construction Work Permits."

WP-X-302, Revision 8, "Installation of Electrical Raceway Supports"

WP-XI-300, Revision 8, "Installation of Electrical Equipment and Instrumentation"

WP-X-300, Revision 13, "Installation of Electrical Raceway"

QCP-X-302, Revision 18, "Installation of Electrical Raceway Supports"

QCP-X-300, Revision 8, "Inspection of Electrical Equipment Installation"

QCP-X-300, Revision 14, "Inspection of Electrical Raceway"

The above procedures are considered to fulfill the requirements of Appendix B to 10 CFR 50 and the licensee's commitments to various industry standards and NRC Regulatory Guides as discussed in the SNUPPS FSAR Sections 3.2, 7, and 8 with one possible exception. Procedure QCP-X-302 states that seismically designated supports for nonsafety raceway (designated as II/I by A/E) that were installed prior to August 12, 1982, need not be inspected. The NRC inspector asked for the rational behind the statement and was provided with a series of documents pertaining to the statement. The documents indicated that during early 1982, the welded attachments for the supports were being inspected in a backfit program. This backfit inspection found substantial numbers of the welds to be deficient when compared to the applicable welding standard, AWS D1.1. Licensee construction management asked their A/E for help in achieving a more satisfactory resolution than reworking the welds. The documents indicate that the A/E inspected 309 supports, this number providing a 95 percent confidence level that would be indicative of the entire population of installed supports. Approximately 18 percent of the supports were found to have welding deficiencies in terms of AWS D1.1 but were none-the-less acceptable from a design load standpoint. On this basis, the A/E concluded that all 309 supports were acceptable and, therefore, the entire population was acceptable without further inspection. It could not be determined during the inspection whether the A/E had established revised acceptance criteria for the supports for "as-built" purposes. This matter will be considered an unresolved item pending clarification of A/E's intent. (8412-02)

b. Observation of Work

The NRC inspector selected the below-listed major electrical components for examination. The examination was directed to the method and quality of equipment attachment to the building structure; method and condition of electrical cable entrances to the equipment; and condition of the equipment.

Hydrogen Recombiners SG01A&B
Vital A.C. Distribution Panels NN-01, 02, 03 and 4
A.C. Inverter NN-14
Reactor Protective System Cabinets SB032 and 38
Battery and Battery Rack NK-14
Motor Control Center NG-03D
Metal Clad Switchgear NB-02 Cubical 11

Each of the above components was found to have been attached to the building structure in accordance with applicable design drawings which in turn reflected the vendor's recommended method.

No violations or deviations were identified.

c. Review of Quality Records-Installation

The NRC inspector reviewed the quality control records pertaining to the below-listed equipment to determine if the records reflected appropriate engineering and appropriate procedural requirements and reflected the "as-built" condition observed by the inspector.

Battery and Rack NK-14
Motor Control Center NG03D
Hydrogen Recombiner SGS01B
Vital A.C. Distribution Panel NN-04
A.C. Inverter NN-14

No violations or deviations were identified.

4. Licensee Action on 10 CFR 50.55(e) Items

The licensee actions in regard to reported 10 CFR 50.55(e) items were reviewed by EG&G Idaho, Inc., personnel assigned to and working under the guidance of NRC personnel. Each of the following items, as identified by the licensee tracking system number and title, are considered to have been completed and are closed.

a. TE53564-K64 Inadequate material control for special scope items.

There is sufficient documentation in the package to assure that all nonidentifiable material has been located and identified or replaced.

b. TE53564-K78 Component Testing Program.

A complete review of the component test program procedures and objectives was completed with all concerned parties and agreements were reached that the program is satisfactory and does perform its intended function.

c. TE53564-K124 - Load Shedder; Emergency Load Sequencer

The vendor was contacted concerning the missing wires on the logic rock assembly. The vendor came to WCGS, placed the wires in the assemblies and the unit was tested and tested satisfactorily.

d. TE53564-K92 - Stitch welding on electrical raceways

There is sufficient documentation in the package showing that the stitch welding was in fact adequate or was reworked to bring it into conformance.

e. TE53564-K99 - Bergen-Patterson Weld Beam Attachments

Additional testing of material from the same bar stock provided acceptable results for the use of the material.

f. TE55780-K09 - Excessive Pressure Transient from Check Valve Closure

This problem was discovered during the high energy line break analysis and was corrected by relocation of the valves.

g. TE55780-K29 - Limitorque Sheared Pinion Keys in Valve Motor Operators

A complete plant audit indicated that none of the motor operators of concern were used in safety-related systems at WCGS.

h. TE55780-K28 - Bergen-Patterson size 6 and size 15 Sway Struts

Additional testing verified that the sway struts would have operated within the design limits if left uncorrected. The sway strut installation was corrected.

i. TE53564-K45 - Undersized Socket Welds

The socket welds were corrected, all craftsmen and QA personnel were retrained in the proper weld procedure to be used for fabrication and checking of the welds.

j. TE53564-K109 - Cracked Edge Connectors on W7300 Process System

The manufacturer performed additional testing of the cards to ensure the cracked edge connectors in no way adversely effect operation of the system.

k. TE53564-K80 - Garrett Solenoid Valves

Modifications were made to the affected solenoid valves to stop the galling problem. The valves were subsequently tested and operated satisfactorily.

l. TE53564-K81 - Workmanship of Swagelok Fittings

The personnel involved in the improper workmanship were retrained on proper installation of swageloks. Pressure testing to locate any further improper assembled fittings and system flushes after completion of system installation was recommended.

m. TE53564-K84 - Brass Fitting on Diesel Fire Pump

The split flare on the governor system was replaced with new tubing. The flare nuts were replaced with steel nuts to prevent further occurrences.

n. TE53564-K86 - Bolt Torque on Instrument Mounts

The damaged bolts were replaced and all the affected transmitters were retorqued using correct torque values. The vendor had originally supplied incorrect values.

o. TE53564-K88 - Welds on Bergen-Patterson Supports

The suspect pipe supports were examined by the manufacturer and the utility to determine if the welds were defective. All welds were found to be satisfactory and only one weld required grinding to remove a surface flaw. The ridge on the supports was identified as a manufacturing ridge and was acceptable.

p. TE53564-K108 - Exposure Threads on Seal Welded Connections

The exposed threads were welded over as required and spot inspections were conducted to locate any others and none were found.

q. TE53564-K91- Structural Steel Welds

The suspect welds were inspected and found to be acceptable even though they did not look exactly like a text book type weld.

r. TE53564-K93 - Loose Parts Found in Steam Generators

The loose parts were removed from the steam generators, several nonconformance welds were repaired satisfactorily and the steam generators were reinspected and found acceptable.

s. TE53564-K115 - T. mble Guide Tube to Seal Table Weld

Originally it was thought that several welds had not been dye penetrant or magnetic particle tested. Documentation was found that verified the welds had been checked in accordance with the Code.

t. TE53564-K117 - Pulsation Dampers

The incorrect supports were removed, the erroneous nameplates were replaced, and correct supports were installed. The dampers were inspected for any damage caused by the original support connections and none was found.

5. Licensee Actions on IE Bulletins

The licensee actions regarding the following IE Bulletins were reviewed by EG&G Idaho, Inc., personnel assigned to and working under the guidance of NRC personnel.

IEB 77-07 Containment Electrical Penetration Assemblies

An audit was performed at WCGS and none of the suspect electrical penetration assemblies have been used.

IEB 80-09 Hydramotor Actuator Deficiencies

The A/E performed an evaluation of these actuators supplied with the incorrect springs and found them to be acceptable as-is.

IEB 80-15 Possible Loss of Emergency Notification System

The utility will install the notification system as soon as the NRC determines what they require for a notification system.

IEB 80-24 Prevention of Damage due to Water Leakage Inside Containment

The WCGS has sufficient redundancy in alarms and indications to prevent an undetected water leak inside containment.

The following bulletin was determined to be not applicable:

84-01 Cracks in BWR Mark I Containment Vent Headers

All of the above bulletins are considered closed.

6. Licensee Actions Regarding Allegations

The NRC inspector reviewed the documented results of licensee investigations and evaluations of allegations by former employees at the construction site. The inspector reviewed the documents in regard to potential direct technical matters that could affect plant safety during

reactor operations. These allegations are being followed up by the NRC and KG&E.

NRC Tracking No.	Short Title
4-83-A-78	12 Allegations Concerning Electrical Components
4-84-A-22	Improprieties in field engineering area
4-84-A-74	Improprieties in Pre-Service Inspection area

The investigations and evaluations were found in a few instances to not fully address items that were expressed as concerns by the alleger or to have addressed them in a manner inconsistent with the details of the concern. Excepting only a few instances as discussed above, the investigations were considered thorough and the evaluations of valid concerns conservative from a safety viewpoint with appropriate consideration given to generic implications. The NRC inspector discussed the apparent investigative deficiencies with licensee management. These three cases remain open pending further NRC review.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. An unresolved item related to NF hanger erection tolerances is discussed in paragraph 2k. Another unresolved item related to II/I raceway support acceptance standards is discussed in paragraph 3a.

8. Exit Meeting

The NRC inspectors met with licensee representatives (denoted in paragraph 1) and H. F. Bundy, NRC Resident Reactor Inspector on June 1, 15, and 28, 1984, and summarized the scope and findings of the inspection. The licensee acknowledged the NRC findings.