



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

February 22, 1985

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

KMLNRC 85-063  
Re: Docket No. STN 50-482/OL  
Subj: Supplemental Information Regarding  
Chapter 17 of the Wolf Creek FSAR

Dear Mr. Denton:

As requested by Mr. Paul O'Connor, NRC Licensing Project Manager for Wolf Creek Generating Station, Kansas Gas and Electric Company has provided supplemental information relating to changes made in Chapter 17.0 of the Wolf Creek Final Safety Analysis Report by Revisions 14 and 15. This information along with the NRC comments on Chapter 17.0 are provided in Attachment A.

If you have any further questions, please contact me or Mr. Otto Maynard of my staff.

Yours very truly,

*Glenn L. Koester*

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OATH OF AFFIRMATION

STATE OF KANSAS )  
 ) SS:  
COUNTY OF SEDGWICK )

I, Glenn L. Koester, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:

E.D. Prothro

E.D. Prothro, Assistant Secretary

By Glenn L. Koester  
Glenn L. Koester  
Vice President - Nuclear

STATE OF KANSAS )  
 ) SS:  
COUNTY OF SEDGWICK )

BE IT REMEMBERED that on this 22nd day of February, 1985, before me, Evelyn L. Fry, a Notary, personally appeared Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.



Evelyn L. Fry  
Evelyn L. Fry, Notary

My Commission expires on August 15, 1985.

ATTACHMENT A

NRC Comment

1. FSAR Revision 15 eliminates the Configuration Control Board and the QA Committee. Identify (by position title) who is responsible for performing the functions of these groups. Specifically, identify who is responsible for:
  - a. Reviewing and approving requests for design changes in order to maintain configuration control.

KG&E Response

- 1a. The current Plant Modification Request (PMR) review process is controlled by Nuclear Department procedures and involves the same organizations previously represented on the Configuration Control Board.

Cognizant organizations including Nuclear Plant Engineering, Operations, Quality, Construction, Nuclear Services, Project Planning and Controls, and Management Systems are involved in the review and approval process for proposed modifications in accordance with applicable procedures.

Specific responsibility for maintaining configuration control lies with the Management Systems Branch utilizing a configuration status accounting records system.

Design change controls are further addressed in FSAR Sections 17.2.3.7 and 17.2.3.8 (Revision 15).

NRC Comment

- 1b. Measuring the effectiveness of KG&E's Quality program.

KG&E Response

The effectiveness of KG&E's Quality program is measured by the Nuclear Safety Review Committee in fulfilling their WCGS Technical Specification commitments (See FSAR Section 17.2.1.10 and WCGS Technical Specifications Section 6.5.2.8).

NRC Comment

- 1c. Initiating changes to KG&E's Quality program as a result of (b).

KG&E Response

The Nuclear Safety Review Committee issues reports to and advises the Vice President - Nuclear on matters pertaining to Quality program effectiveness. The Vice President - Nuclear was also the Chairman of The QA Committee, thus the mechanism for initiating changes remains the same.

NRC Comment

- ld. Reviewing deficiencies and establishing actions or affirming that adequate corrections are made.

KG&E Response

The Nuclear Safety Review Committee reviews major deficiencies as outlined in Section 6.5.2.7 of the WCGS Technical Specifications and advises the Vice President - Nuclear of any actions the Committee feels are warranted beyond those already prescribed. The Committee also reviews the corrective action systems established to resolve deficiencies and their causes as part of their Technical Specifications responsibilities (Section 6.5.2.8).

NRC Comment

- le. Reviewing notices of violations received from the NRC and KG&E responses.

KG&E Response

A portion of the Nuclear Safety Review Committee charter, as established in WCGS Technical Specifications Section 6.5.2.7, is the review of violations of codes, regulations, orders, Technical Specifications, license requirements, and internal procedures or instructions having nuclear safety significance. This would include KG&E actions taken in response to any such violations.

NRC Comment

2. FSAR Revision 14 introduced the concept of conditional release of nonconforming items, and Revision 15 further addressed the concept.
  - a. In the process, the commitment that repaired and reworked items would be reinspected per "original inspection and test requirements or approved alternatives" has been changed to reinspection per "applicable procedures." Revert to the prior commitment or justify not doing so.

KG&E Response

Table 17.2-3 and Appendix 3A of the Wolf Creek FSAR contain KG&E commitments relating to RG 1.33 and ANSI N18.7-1976. The superseded commitment which stated that repaired and reworked items are reinspected per "original inspection and test requirements or approved alternatives" is inconsistent with ANSI N18.7, Section 5.2.14. The last sentence of paragraph one of this section states, "Repaired and reworked items shall be inspected in accordance with applicable procedures." Chapter 17.0 was modified in Revision 14 to reflect these words. KG&E feels that this modification is required to maintain consistency with the commitment to the ANSI standard."

NRC Comment

- 2b. Describe the involvement of KG&E's QA organization in the conditional release of safety-related items.

KG&E Response

Safety-related and special scope conditional releases are reviewed and approved by KG&E QA prior to implementation. This process is addressed in QA procedures.

NRC Comment

- 2c. Describe how the use of a Plant Modification Request ties into the use of the WCGS nonconformance documents discussed in FSAR Section 17.2.15.3.

KG&E Response

Plant Modification Requests (PMRs) are used in the Nonconformance Program to "close the loop" for dispositions of "use-as-is" or "repair." The PMR process ensures that all aspects of plant operation are considered in light of the fact that the dispositioned item is now not exactly per original design. These considerations include revision of applicable drawings; possible revisions to operation, test, maintenance and inspection procedures; training of affected personnel, changes to spare parts inventory; unreviewed safety questions; review of licensing documents; etc.

NRC Comment

- 2d. Describe how the conditional release documentation ties into the nonconformance documents discussed in FSAR Section 17.2.15.3.

KG&E Response

The "conditional release" is limited in its use in that it only allows nonconforming items to be installed and tested after review and approval of appropriate organizations. The last paragraph of Section 17.2.15.2 specifically disallows the use of the conditional release for nonconforming items required to be operable for Technical Specification compliance.

NRC Comment

- 2e. Replace the commitment (not in Revision 15) that conditional release evaluations "shall consider whether operation of the nonconforming item constitutes an unreviewed safety question" or justify not doing so.

#### KG&E Response

- 2e. Revision 15 of Section 17.2.15.2 specifically prohibits the use of the conditional release for items requiring Technical Specifications operability. Since items released under this program are not allowed to be operated, the unreviewed safety question is not applicable.

It should be noted that the Plant Modification Request program does contain provisions for unreviewed safety question evaluation.

#### NRC Comment

3. FSAR Section 17.2.15.3 and 17.2.15.7 were revised to clearly identify when each of the WCGS nonconformance documents are used and to clarify the trend analysis of nonconformance documentation. Describe measures that ensure the trend analysis of all nonconformances regardless of which nonconformance document is used. Clarify that hardware malfunctions are considered in the trend analyses.

#### KG&E Response

Nonconformance Reports (NCRs), Deficient Document Notices (DDNs) and Work Requests are analyzed by the Quality Branch for potential program deficiencies and vendor performance.

Hardware malfunctions of equipment are reviewed within KG&E Operations by the established Nuclear Plant Reliability Data System (NPRDS) program. The program will determine and evaluate the causes of hardware malfunctions/failures. A review and evaluation of previous experiences (trending) for the equipment or component is made to determine whether the item is functionally reliable. The program provides corrective measures prior to the repair/replacement of components in safety-related systems which have performed in an unreliable manner. The NPRDS program will be initiated at Commercial Operations.

#### NRC Comment

4. FSAR Section 17.2.17.2 no longer indicates that the Manager Management Systems administers site QA records. Identify who (by position title) is responsible for assuring proper handling and maintenance of QA records generated, received and/or stored at the WCGS. (Note that FSAR Figure 17.2-2 continues to show a "Records Management" block below the "Manager Management Systems block.")

#### KG&E Response

Handling and maintenance of QA records generated, received, and/or stored at the WCGS is assigned to the document control section under the Superintendent of Regulatory, Quality and Administrative

KG&E Response (cont'd)

4. Services who reports to the Plant Manager (See Figure 13.1-1). The Manager Management Systems is responsible for assuring the handling and maintenance of QA records generated, received and stored at the Home Office.

NRC Comment

5. FSAR Section 17.2.1.11 introduces the Manager Quality First and the Quality First Program. This section of the FSAR states that the Quality First Program "provides an independent organization to investigate safety and quality concerns." Describe the program and the organization in more detail than given in 17.2.1.11.

KG&E Response

The KG&E Quality First Program establishes the necessary administrative and investigative measures to ensure that all quality concerns related to safe plant operations, quality of work and compliance with project requirements are appropriately evaluated, investigated, dispositioned, verified and documented.

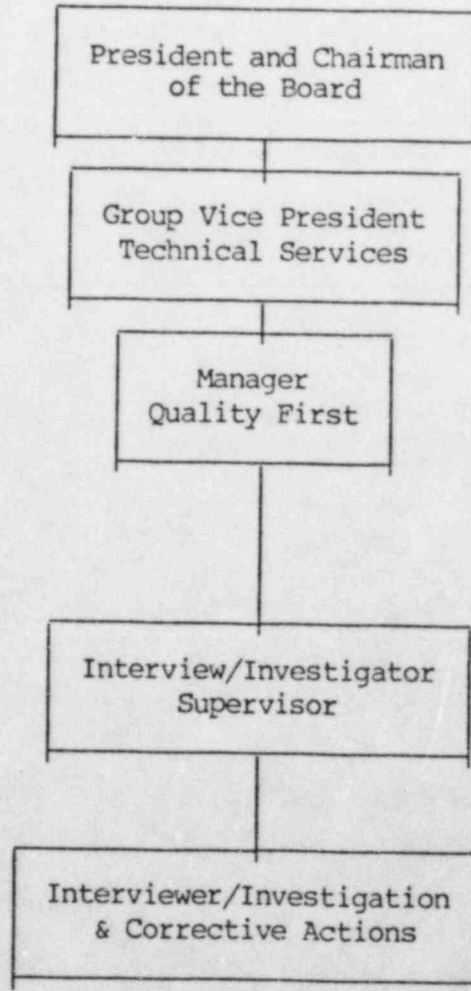
The overall objective of the KG&E Quality First Program is to:

- a. Assure that all WCGS employees, whether KG&E or onsite contractors, are made aware of the established channels/systems which they have available to state a quality concern.
- b. Ensure that quality concerns are evaluated and valid quality concerns are investigated, dispositioned, verified, and followed up in accordance with established procedural methods by an organization not directly responsible for the area of concern. Discrepancies are evaluated for reportability to the NRC per 10CFR50.55(e), Part 21, etc.
- c. Attempt to preserve the anonymity and/or prevent the harassment/discrimination of employees expressing quality concerns.
- d. Ensure that investigation results are made available to the individual(s) who initiated the quality concern provided they are known.
- e. Ensure all employees are made aware of and are provided an opportunity to discuss concerns with the investigative organization 1) prior to terminating employment at WCGS, or 2) anytime on a "walk-in" basis.

KG&E Response (cont'd)

5. f. Establish a Quality Concern Investigation Status Report System to KG&E Management on an assigned frequency. Cognizant officials, managers, and regulators are kept apprised during the investigation.

Quality First Organization





NRC Comment

6. FSAR Section 17.2.1.7.5 has been deleted. Identify who (by position title) is responsible for coordinating outage activities. FSAR Section 17.2.1.12 states that Manager Construction provides Construction Support to the project. Describe the QA program applied to the construction support activities during the WCGS operations phase.

KG&E Response

The responsibilities of the position of Manager-Outage Planning have been divided among several existing positions. The Plant Manager has overall responsibility for outage activities. The Supervisor - Project Planning and Control is responsible for scheduling outage activities. The Manager - Construction is responsible for the performance of construction type activities (i.e. major maintenance and modification) assigned to his organization. (Reference ANSI N18.7, Section 5.2.7).

Through the completion of Power Ascension, the KG&E Construction Support program utilizes safety-related contractors with Quality Assurance Programs approved in accordance with FSAR Sections 17.2.2.5, 17.2.4 and 17.2.7. During commercial operation, KG&E Construction will utilize KG&E plant modification and maintenance procedures. Activities outside the scope of these procedures may be contracted to Contractors with approved safety-related Quality Assurance Programs.

NRC Comment

7. Clarify (from Revision 15 of FSAR Figure 17.2-2) to whom (by position title) the Superintendent Startup Quality Control reports.

KG&E Response

The Superintendent Startup Quality Control will report to the Director Quality until such time that the Startup Organization is dissolved.

NRC Comment

8. KG&E has clarified its commitment to Regulatory Guide 1.30 and 1.116 regarding control of items in storage by indicating that the adequacy of protective measures for items in storage is verified by warehouse, quality control, and quality assurance personnel on an audit/surveillance basis. It is not clear what this means. It would appear appropriate for warehouse personnel to initiate/perform/install/maintain/etc. the protective measures, for quality control personnel to inspect that these actions meet requirements, and for quality assurance personnel to periodically audit storage facilities to assure the system is working. Clarify how KG&E meets or varies from this approach.

KG&E Response

8. KG&E Warehouse personnel are responsible for tracking and implementation of the warehouse storage/maintenance program. Additionally, warehouse personnel perform regular inspections of storage areas for cleanliness and orderliness.

KG&E Quality Control personnel perform inspections of maintenance activities as prescribed in approved procedures. Additionally, Quality Control personnel perform periodic surveillance inspections of storage areas for compliance to applicable requirements.

KG&E Quality Assurance personnel perform periodic audits and surveillances of warehouse storage/maintenance activities to assure compliance to applicable requirements.