

APPENDIX
U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-482/84-37

CP: CPPR-147

Docket: 50-482

Category: A2

Licensee: Kansas Gas and Electric Company (KG&E)
P. O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station (WCGS)

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

Inspection Conducted: September 25-27, 1984

Inspectors: Walter P. Haass / jr 10-9-84
Edwin F. Fox, Jr., Technical Assistant
PSAS, IE Date

Glen L. Madsen 10-9-84
Glen L. Madsen, Reactor Inspector Date

Walter P. Haass 10-9-84
Walter P. Haass, Special Assistant for
Allegations and Investigations, IE Date

Approved: L. E. Martin 10/24/84
L. E. Martin, Chief Wolf Creek Task Force Date

Inspection Summary

Inspection Conducted September 25-27, 1984 (Report 50-482/84-37)

Areas Inspected: Routine announced inspection of the structure and implementation of licensee programs for investigation and resolution of quality concerns resulting from exit interviews with licensee and licensee contractor employees, walk-in interviews and hot-line telephone calls. The inspection involved 53 inspector-hours onsite by three NRC inspectors.

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

DETAILS

1. Persons ContactedPrincipal Licensee Personnel

*R. M. Grant, Director - Quality
*C. A. Snyder, Manager - Quality First
O. L. Thero, Quality First Interview Supervisor
R. L. Scott, Quality First Investigation Supervisor
R. Walters, Quality First Investigator
L. C. Issinghoff, Quality First Interviewer
Mark Stewart, Engineer/Quality Assurance

NRC Personnel

*Richard Denise, Director

Other Personnel

Other licensee employees contacted included technicians and office personnel.

*Attended exit interview.

2. Exit Interview

The inspection scope and findings were summarized on September 27, 1984 with those persons indicated in paragraph 1 above.

3. Organizational Structure of KG&E Program for Processing Allegations

The KG&E Quality First program for processing allegations is implemented under the direction of C. A. Snyder, Manager-Quality First, who reports to R. M. Grant, Director-Quality. The latter reports to G. L. Koester, Vice President-Nuclear. The Quality First organization is acceptably located within the KG&E organization to assure proper attention and independence. This is a recent change from the prior organizational arrangement in which the responsibility for Quality First was assigned to W. J. Rudolph, Manager-Quality Assurance. The new arrangement minimizes the potential for conflicts of interest in the processing of allegations.

4. Formality of the Effort as Reflected in Official Instructions

Formal guidelines for reporting quality concerns (Project Directive III-29) and for processing the concerns by Quality First (QPM 19, Rev. 0) are documented and have been made available to affected personnel. However, our inspection identified the need for additional guidance in the following areas:

- a. Processing of wrongdoing allegations.
- b. Responsibilities of the Engineering Support Group.
- c. Definitions of Priority 1 and 2 categories of concerns.
- d. Trending analyses to assure identification of generic concerns.
- e. Qualification criteria for staff personnel.

Guidance for the processing of wrongdoing concerns (i.e., drugs, alcohol, intimidation, harassment, discrimination, falsification) was particularly deficient. Responsibility for the resolution of these concerns, involvement of management, and the procedures for closeout were not described.

5. Information Flow

Procedures for the flow of information as stated in QPM 19, Rev. 0 are adequate, with the exception that no feedback mechanism existed for wrongdoing concerns directed to Security or KG&E management that may include technical deficiencies, and there was no feedback mechanism for Security or KG&E management regarding corrective action or disposition of wrongdoing concerns for file closeout.

6. Number and Qualifications of Personnel

The Quality First organization was found to be comprised of three interviewers, one engineering support person, and thirteen investigators (for resolving technical concerns) with each group directed by a supervisor. A request has been made and approved for ten additional investigators who are expected to be available shortly. Continuing attention appears to be devoted to staffing needs based on the number of concerns received to date and the number anticipated from the remaining site contractor personnel.

The qualifications of the Quality First staff, based on the review of resumes, appeared to be adequate for the assigned responsibilities in the various engineering, welding and quality assurance areas of expertise. However, no documented qualification requirements for these positions were given in QPM-19 to provide continued assurance of qualified staff personnel. Further, use of specific investigators to resolve quality concerns consistent with their areas of expertise should be properly coordinated.

7. Precision and Adequacy of Decision Making Process

A review of all the 27 closed technical quality files (some of which include more than one concern) was conducted through the evaluation of file documentation. It was concluded that the disposition of the technical concerns was adequate up to the point that the concern was substantiated or determined to be without merit; technical considerations of adequate broadness were applied in the evaluation.

8. Documentation and Record Retention

For the closed technical files, documentation appeared adequate and complete to facilitate auditing of the records. In addition, all records are maintained in a confidential manner to protect the identity of the allegeders and are filed in accordance with QA program commitments.

9. Management Notification

A review of the completed technical actions indicated that upper management is notified of the results of the investigation (whether substantiated or not) and provided a copy of the investigative report. Management participates in Quality First meetings once every two weeks. However, the inspectors found no documented evidence of management feedback with regard to concerns tracking, analysis, job performance, or suggested improvements.

10. Trending and Assessment of Trends

Trending activities currently encompass projection analysis for total program scope definition, and identification of common technical areas across the various quality concerns. The latter could be useful for identifying generic concerns.

11. Implementation of the Quality First Program

Based on the review of the technical files closed thus far, the Quality First organization is effectively implementing the program as planned and defined in QPM-19. The review indicated that the technical concerns appear to have been closed properly.

A brief review of those concerns involving wrongdoing (12 files were reviewed) indicated that in most instances they were transferred from Quality First to Security (for drugs) or to KG&E management for corrective action or disposition after Quality First investigation. However, no documentation was found to describe the corrective action or disposition of the concerns and there was no feedback from these organizations to Quality First for closeout. With regard to appropriateness of involving DOL on matters of discrimination, KG&E indicated that employee protective rights are posted at various plant locations.

12. Priority Treatment of Concerns

Quality First has established categories for assigning priority for the processing of concerns. Priority 1 concerns are those determined to impact fuel load, while Priority 2 concerns are those of a less significant nature. However, as stated in item 4 above, QPM-19 does not address the criteria for determining the placement of concerns in each category. NRC needs to be kept informed regarding category placement decisions for all quality concerns.

13. Progress of Effort Toward Resolution of Concerns

The licensee is apparently intent upon resolving all of the quality concerns, Priority 1 as well as Priority 2, by their projected fuel load date. As of September 27, 1984, there were 342 open concerns, of which 212 are Priority 1, and 220 closed concerns, of which 77 had been transferred to other KG&E organizational units for resolution. The licensee is aware of the backlog and the effort required to resolve the issue. Resources necessary to accomplish this task prior to fuel loading have been authorized. The licensee is also fully aware of the need for NRC to be informed regarding the adequate resolution of all quality concerns.