

APPENDIX A
NOTICE OF VIOLATION

Kansas Gas and Electric Company
Wolf Creek Generating Station

Docket: 50-482
Permit: CPPR-147

Based on the results of an NRC inspection conducted during the period of September 10 - December 14, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

1. Failure to Specify Appropriate Criteria in a Component Support Design Specification to Assure Compliance with Regulatory Guide 1.85

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by and accomplished in accordance with appropriate instructions, procedures, or drawings.

Appendix 3A of the SNUPPS Final Safety Analysis Report commits to compliance with the requirements of Regulatory Guide 1.85. The use of ASME Code Case 1644-7(N-71-7), "Additional Materials for Component Supports, Section III, Division 1, Subsection NF, Class 1, 2, and 3 and MC Component Supports," is conditionally accepted by Regulatory Guide 1.85. The stipulated conditions of acceptance are to either restrict the maximum measured ultimate tensile strength (UTS) of the component support material to 170 Ksi or, if it is desired to use material with up to 190 Ksi UTS, to specify impact testing of the material in the Design Specification. For the latter case, it is required to be demonstrated that (a) the impact test results for the material meet code requirements, and (b) the material is not subject to stress corrosion cracking by virtue of the fact that (1) a corrosive environment is not present and (2) the component containing the material has essentially no residual stresses or assembly stresses, and it does not experience frequent sustained loads in service.

Contrary to the above, SNUPPS Design Specification No. 10466-M-218A(Q), Revision 6 dated April 11, 1979, permitted the support manufacturer (i.e., Bergen Paterson) to utilize ASME Code Case 1644-7(N-71-7) for materials selection, without imposing the restrictions on use contained in Regulatory Guide 1.85.

This is a Severity Level IV Violation. (Supplement II) (482/8423-01)

2. Failure to Perform Nondestructive Examination of Component Support Field Welds in Accordance with Drawing Requirements

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures, or drawings.

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Daniel International (DIC) Drawing No. M06-EJ04-C021/231(Q), Revision 5, requires that nondestructive examination of welds be performed in accordance with Subsection NF, paragraph NF-5212 in Section III of the ASME Code. Paragraph NF-5212 requires that full fillet welds be examined by either the magnetic particle or liquid penetrant examination methods.

Contrary to the above, the field weld (i.e., Weld 1) in the EJ04-C021 component support, which was specified by the support manufacturer to be a full fillet weld, received only a visual examination and was not examined by either the magnetic particle or liquid penetrant methods.

This is a Severity Level V Violation. (Supplement II) (482/8423-01)

3. Failure to Follow Procedure with Respect to Handling of Potentially Reportable Nonconformances

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures, or drawings, and that these instructions, procedures, or drawings include acceptance criteria for determining that important activities have been accomplished.

Paragraph 15 of "Instructions For Completing Nonconformance Report (NCR)" in DIC Construction Procedure AP-VI-02 states, "Potential 50.55(e) or Part 21 - The Discipline Manager, after review of nonconformance, shall check the appropriate block. If the 'yes' block is indicated, refer to Paragraph 4.2.6 of this procedure for further action." Paragraph 4.2.6 states, "Evaluate NCR to determine if there is a potentially reportable nonconformance under the provisions of 10 CFR 50.55(e) or Part 21, and check the appropriate box. When it is determined that there is a potentially reportable nonconformance, immediately hand-carry a copy of the NCR to the KG&E Significant Deficiency Coordinator/Construction where a 'WCGS Request for Reportability Evaluation' shall be generated and further action taken,"

Contrary to the above, NCRs with the appropriate box checked off indicating potentially reportable conditions existed, were not immediately hand carried to KG&E's significant deficiency coordinator, as evidenced by the September 1984 date on the NCRs, and the DIC reportability evaluation dated December 1984.

This is a Severity Level IV Violation. (Supplement II). (482/8423-03)

Pursuant to the provisions of 10 CFR 2.201, Kansas Gas and Electric Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: FEB 25 1985