

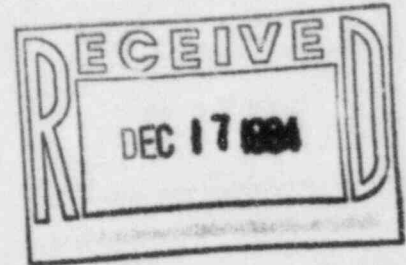


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

December 7, 1984

Mr. R.P. Denise, Director
Wolf Creek Task Force
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 84-222
Re: Docket No. STN 50-482
Subj: Response to Inspection Report 50-482/84-38

Dear Mr. Denise:

This letter provides the Kansas Gas and Electric Company (KG&E) response to your letter of November 19, 1984, which transmitted Inspection Report STN 50-482/84-38. As requested, the violation identified in the Inspection Report is being addressed in three parts:

- a) Corrective steps which have been taken and the results achieved;
- b) Corrective steps which will be taken to avoid further violations; and
- c) The date when full compliance will be achieved.

VIOLATION 482/84-38: FAILURE TO PROPERLY FOLLOW PROCEDURES

Finding:

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, "Activities affecting quality ... shall be accomplished in accordance with ... instructions, procedures, or drawing ..."

- 1. Startup administrative procedure preoperational test program implementation ADM 14-200 requires, in part, that resoluuion of a test discrepancy be signed and dated by the system startup engineer.

Contrary to the above, test discrepancies TD-010 and TD-011 of preoperational test SU3-EM03 were resolved

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and entered on the discrepancy log but were not signed and dated by the system startup engineer.

2. ADM 14-200 also requires, in part, that "...When pre-operational test activity ... not expected to continue ... 48 hours ... a test suspension shall be declared"

Contrary to the above, Preoperational Test procedure SU3-BB08 was stopped September 10, 1984, and not resumed until October 8, 1984. A period of 27 days elapsed without complying with the steps required to place the test in a suspend status.

3. ADM 14-200 also requires, in part, that "...An additional entry in chronological log must be made explaining why the discrepancy will not invalidate subsequent steps...."

Contrary to the above, test discrepancies TD-001, 002, and 003 in Preoperational Test Procedure SU3-BB08 have no entries in chronological log "explaining why the discrepancy will not invalidate subsequent steps or sections."

4. Plant Operating Logs Procedure ADM 02-020 requires an entry to the control room log when equipment status changes.

Contrary to the above, no entry was made between the hours of 1425 and 1930 on October 9, 1984, in the control room log noting the restoration of reactor coolant pump "D" seal water return isolation valve BB-H1S-8141D and subsequent closing which permitted continued cooldown in support of test SU3-BB08.

5. Work Request Procedure ADM 01-057 requires, in part, that "The work request is intended to follow the job from the time the requester decides there is a job ... is completed, tested, and returned to service."

Contrary to the above, air line fitting connecting service air supply to the pressure regulator which actuates BB-H1S-8141D was repaired without the issuance of a work permit.

6. ADM 01-057 also requires, in part, "... Priority "1" WRs should be hand carried to the responsible supervisor for immediate action. If outside of regular hours ... undertaken at the director of the shift supervisor"

Contrary to the above, Priority "1" work request 13702-84 dated October 10, 1984, time 1510, was not hand carried to the responsible supervisor as required during normal work hours.

Response:

a) Corrective steps which have been taken and results achieved:

1. Test Discrepancies 010 and 011 to preoperational test procedure SU3-EM03, "Accumulator and Safety Injection System Check Valve Preoperational Test" have been resolved by signature of the System Startup Engineer in the Chronological Test Log on October 4, 1984.

Attachment E, step 8, to ADM 14-200, Revision 7, "Preparation Test Program Implementation", references section 4.6 to ADM 14-200. Step 4.6.3 states in part: "Resolution of Test Discrepancies should be clearly identified on the Discrepancy Log and traceable to documented actions and/or resolution documentation." The Test Discrepancy was appropriately entered in the Chronological Test Log at the time of occurrence. By closure of the Test Discrepancies in the Chronological Test Log, the procedural requirements of ADM 14-200 have been adhered to.

2. SU3-BB08, "Pressurizer Heater and Spray Test" contains four testing sections. Section 7.1 through 7.3 require performance at Reactor Coolant System normal operating temperature and pressure. These sections were completed on September 19, 1984 during Hot Functional Testing (HFT). Section 7.4 requires the Reactor Coolant System to be at 160⁰F + 2⁰F. This condition existed on October 8, 1984 following HFT.

Prior to performance of Test Section 7.4, the System Startup Engineer recognized that a test suspension should have been declared at the completion of Test Section 7.3. At that time the Startup Engineer declared that the test had been in suspension, made an appropriate Chronological Test Log entry and filed a Restoration Plan. He then took the necessary actions, including an appropriate Chronological Test Log entry to resume testing and performed Test Section 7.4.

In addition, the Startup Engineer wrote a Test Discrepancy Report (TDR 005) to identify this administrative violation and document the evaluation that test validity was not compromised. Based on that evaluation the Startup Engineer has recommended an accept-as-is resolution for the administrative violation.

This violation has been fully documented and will be evaluated by the Joint Test Group prior to test result approval recommendation.

3. A late Chronological Test Log entry has been entered to explain why Test Discrepancy (TD) 001 and 002 to SU3-BB08 did not invalidate subsequent steps. This entry dates November 27, 1984 at 1350 hours, appears on sheet No. 11 of the Chronological Test Log Entry for SU3-BB08. On September 10, 1984 at 0330 hours a late entry was made for TD-003 (Sheets 2 and 3 of Chronological Test Log) explaining why this test discrepancy did not invalidate subsequent steps.
4. The Superintendent of Operations has issued to all Operations personnel instructions stressing the importance of improved log keeping, including guidelines for adequate log entries. The Operations Coordinator - Operations has been instructed to be more vigilant during review of the logs for quality and consistency. ADM 02-020 is being revised to provide clearer instructions on the logging of major equipment status changes.
5. Work Request #13702-84 was completed to document the subject work. Emphasis has been provided to the Shift Supervisors and Supervising Operators that work must be accurately documented. In addition, the Plant Manager personally discussed the need for accurate documentation of work with all Shift Supervisors and Supervising Operators and the requirement for following station procedures.
6. The Superintendent of Operations has issued to the Shift Supervisors and Supervising Operators instructions reminding them of the requirements of ADM 01-057, "Work Request" including the hand carrying of a work request to the responsible Supervisor as required during normal working hours. Additionally these operations personnel are required to review ADM 01-057 to refamiliarize themselves with the requirements. The Superintendent of Operations has additionally requested the Training Department provide retraining on ADM 01-057 to all licensed operators.

December 7, 1984

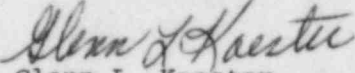
b) Corrective steps which will be taken to avoid further violations:

- 1, 2, and 3. System Startup Engineers have received intensive retraining on applicable administrative procedures and have been required to successfully take and pass a written examination on administrative requirements. Additionally Startup supervision has been instructed to perform daily independent reviews of ongoing test activities.
4. ADM 02-020, "Plant Operations Logs", will be revised to provide improved definition and clarify on logging requirements for major equipment status changes.
5. The Plant Manager and Superintendent of Operations have personally discussed with all Shift Supervisors and Supervising Operators the requirement for the issuance of a work request to properly document work activities and that station procedures are to be strictly adhered to.
6. The Superintendent of Operations has requested that the Training Department provide retraining to all licensed operators on ADM 01-057, "Work Request" prior to December 31, 1984.

c) Date when full compliance will be achieved:

- 1, 2, and 3. Full compliance has been achieved.
4. Full compliance will be achieved by December 20, 1984.
5. Full compliance has been achieved.
6. Full compliance will be achieved by December 31, 1984.

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

Yours very truly,

Glenn L. Koester
Vice President - Nuclear

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