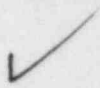




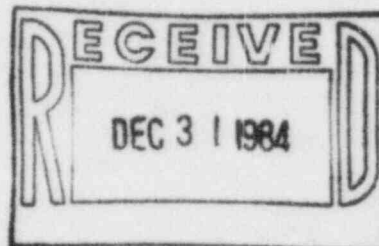
KANSAS GAS AND ELECTRIC COMPANY



GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

December 27, 1984

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



KMLNRC 84-239  
Re: Docket No. STN 50-482  
Subj: Response to Inspection Report 50-482/84-35

Dear Mr. Denise:

This letter provides the Kansas Gas and Electric Company's (KG&E) response to your letter of November 27, 1984, which transmitted Inspection Report STN 50-482/84-35. 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 482/84-35: VIOLATION OF 10CFR50, APP. B. CRITERION V

FINDING:

10CFR 50, Appendix B, Criterion V, as implemented by Wolf Creek Plant Quality Assurance Program, FSAR Section 17.2.3, requires that activities affecting quality be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Contrary to the above, the following was identified:

- 1. Several packages of radiographic film in the DIC vault were not stored in accordance with Administrative Procedure ADM 07-406, paragraph 6.2.2.3.1
- 2. The Plant Set Point Document and the Plant Electrical Termination document (E17000), exceed the number of unincorporated change notices allowed by QPM-6, paragraph 6.1.6. E17000 and other documents also exceed the time limit for unincorporated changes allowed by this paragraph.

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December 27, 1984

3. The Maintenance and Test Measuring Equipment Calibration Log is not being maintained by the responsible group leaders as required by Procedure ADM 08-210, paragraph 5.3.

RESPONSE:

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

1. The procedure governing the storage of radiographic film in the DIC vault is DIC Procedure AP-IX-04 rather than ADM 07-406. However, Procedure AP-IX-04 also addressed stacking of radiographic film and references ANSI PH 1.43.

The film packages were unwrapped to check the placement of film inside. Arrows were placed on the outside of the packages to indicate the proper storage direction. The packages were then placed in storage in accordance with Procedure AP-IX-04, Revision 1, paragraph 3.19. This effort was complete on 10-5-84.

2. Neither the Total Plant Setpoint Document (TPSD) nor the Plant Electrical Termination document (E17000) are governed by the requirements of QPM-6, paragraph 6.1.6. QPM-6 is a KG&E Quality procedure whereas the TPSD is a KG&E Operations document. Incorporation of change notices is governed by procedures ADM 05-102, Revision 1 and ADM 05-103, Revision 1. E17000 is a Bechtel document which is governed by procedure EDPI 4.47-01, Revision 18.

Neither of the above referenced procedures contains a limit to the total number of change notices issued against the documents before revision. Both referenced documents were reviewed and found to be in compliance with the appropriated governing procedure concerning incorporation of change notices.

3. The Maintenance and Test Measuring Equipment Calibration Log is required to be maintained by Procedure ADM 08-210. It is utilized as a working tool and serves as a convenient reference to the calibration files. The programmatic controls for the M&TE program are the calibration data sheets, the tool calibration stickers, the history of use data, and the administrative requirement for using only in-calibration tools.

The log was updated and is now being maintained in accordance with the requirements of procedure ADM 08-210.

Mr. R.P. Denise  
KMLNRC 84-239

December 27, 1984

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

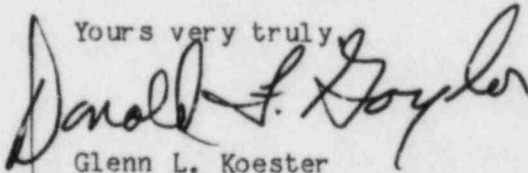
1. The Document Control Technician and Clerks were instructed to ensure that any future radiograph film received by Document Control, shall be checked and markings (Arrows) placed on the package to prevent any film from being stored in error. The Document Control Technician and Clerks were also required to read the Manufacturer's Recommendation in accordance with AP-IX-04, Revision 13, paragraph 3.19. This item was complete on 12-14-84.
2. None required.
3. A Maintenance Engineer has been assigned the responsibility for review of the calibration data sheets and the updating of the subject log.

c) Date when full compliance will be achieved:

The corrective actions documented in a and b above have all been completed.

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

*For*

GLK:kc

xc:RDMartin, Reg. IV  
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