JUN 10 1985

In Reply Refer To:
Docket: STN 50-482/84-22

Kansas Gas and Electric Company
ATTN: Glenn L. Koester
Vice President - Nuclear
P. O. Box 208
Wichita, Kansas 67201

Gentlemen:

Thank you for your letter of December 21, 1984, in response to our letter and Notice of Violation dated November 21, 1984. We have reviewed the implementation of your corrective actions and determined that full compliance has been achieved and will be maintained. Closure of the violation is documented in NRC Inspection Report 50-482/85-03.

Sincerely,

Original Signed By:
Richard P. Denise

R. P. Denise, Director
Wolf Creek Task Force

cc:
Kansas Gas and Electric Company
ATTN: Gene P. Rathbun, Manager
of Licensing
P. O. Box 208
Wichita, Kansas 67201

Forrest Rhodes, Plant Superintendent
Wolf Creek Generating Station
P. O. Box 309
Burlington, Kansas 66839

Kansas Radiation Control Program Director

RPB2/A	DRSP
LEMartin:jc	RPDenise
6/4/85	6/7/85

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PDR ADOCK 05000482
Q PDR

IE01

bcc to DMB (IE01)

bcc distrib. by RIV:

RPB2	Myron Karman, ELD, MNBB (1)
Resident Inspector	R. D. Martin, RA
Section Chief (RPB2/A)	R. P. Denise,
EP&RPB	J. Harrison, RIII
RIV File	
MIS System	
RSTS Operator	

KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

December 21, 1984

RECEIVED
DEC 24 1984

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

KMLNRC 84-234
Re: Docket No. STN 50-482
Ref: Letter dated 11/21/84 from RDMartin, NRC, to GLKoester, KG&E
Subj: Enforcement Action 84-107

Dear Mr. DeYoung:

Attached is Kansas Gas and Electric Company's (KG&E) response to Violation II, as documented in the Reference. Pursuant to 10CFR2.201, the following five items are addressed for the alleged violation:

1. Admission or denial of the alleged violation;

2. The reasons for the violation, if admitted;

3. The corrective steps that have been taken and the results achieved;

4. The corrective steps that will be taken to avoid further violations; and

5. The date when full compliance will be achieved.

KG&E's response to Violation I (Violation Assessed Civil Penalty) will be transmitted by separate letter on or before December 31, 1984. This extension was discussed and agreed to during a December 18, 1984, telephone call between Mr. Lawrence Martin of the Nuclear Regulatory Commission (Region IV) and Mr. Otto Maynard of KG&E.

Please contact me or Mr. Otto Maynard of my staff, if you have any questions concerning KG&E's response to the alleged violation.

Very truly yours,

Glenn L Koester

GLK:cks
Attach

xc-RDMartin COPY FOR
RPDenise
PO'Connor
HBundy

8412310121 5pp

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:

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

E.D. Prothro, Assistant Secretary

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED that on this 21st day of December, 1984, 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 NOTARY PUBLIC STATE OF

Evelyn L. Fry
Evelyn L. Fry, Notary

My Commission expires on August 15, 1985.

Attachment to
84-234

VIOLATION NOT ASSESSED CIVIL PENALTY

FINDING

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting quality shall be accomplished in accordance with appropriate instructions, procedures, and drawings, and that these instructions, procedures, and drawings contain appropriate quantitative acceptance criteria.

Bechtel Drawing E-1R8900, Revision 1, "Raceway Notes, Symbols and Details" states in paragraph 3.36.4 that:

> "Minimum separation between different Class 1E conduit systems and minimum separation between Class 1E conduit systems and non 1E conduit systems shall be 1". Separation shall be measured between the outside edges of the conduit".

Bechtel Drawing E-01013(q), Revision 11, requires the following:

1. Paragraph 5.8.1.6 - "Within the control boards and other panels associated with protection systems, circuits and instruments of different separation groups shall be independent and physically separated horizontally and vertically by a distance of 6 inches".

2. Paragraph 5.8.3 - "Non-safety related circuits shall be separated from Class 1E circuits by the same distances applicable to Class 1E circuits of different groups".

Contrary to the above, the following activities affecting quality were not accomplished in accordance with appropriate drawings:

1. There were seven cases noted where conduit-to-conduit separation was less than one inch.

2. There were five areas in the control panels and cabinets where electrical cable separation was less than six inches.

RESPONSE

1. Admission or denial of the alleged violation:

There were cases in which the conduit-to-conduit separation was less than one inch. In addition, as identified and documented by KG&E prior to the NRC's inspection, there were control panels and cabinets in which electrical cable was separated by less than the specified six inches.

2. The reason for the violation, if admitted:

One inch separation for flexible conduit is an individual inspection attribute the inspector must enter on the Quality Checklist. In addition, the correct installation of the flex is an item that is looked for on walkdowns during system turnover and again during room/area turnover. Deviations from the separation criteria primarily resulted when the installed flexible conduit was slightly longer than required. This resulted in a slight bowing of the conduit. Therefore, the one inch separation existed unless two of the conduits were moved so that they bowed toward each other.

Deviations from the six inch separation criteria in control panels resulted primarily from the installation of field run cable causing slight movement of previously installed cables or the introduction of a cable into an area via a route not allowing the minimum separation. Again, this condition was identified and documented prior to the NRC;s inspection.

3. The corrective steps which have been taken and the results achieved:

In order to document and assure resolution of the deficiency concerning 1 inch conduit-to-conduit separation, KG&E issued Corrective Action Request (CAR) 15. All "Q" Buildings were subsequently walked down to identify deviations from the separation criteria. These deviations were documented on Nonconformance Report (NCR) 1 SN 20443 E and are currently being corrected by providing physical restraints such as tie-wraps or reworking the conduits to maintain separation.

As stated in item 1 above, the concern with 6 inch cable separation in the main control panels had been identified and documented on a KG&E Startup Field Report (SFR) prior to the NRC's inspection. Since the issuance of the SFR, all main control board panels have now been inspected and deviations of the 6 inch separation criteria have been documented on Nonconformance Report (NCR) 1 SN 20766 E. Rework is in progress to either provide the required separation or provide a physical barrier between the wires.

In addition, the safety significance of both of the separation deviations has been evaluated for reportability pursuant to 10CFR50.55(e) and determined not to be a significant safety concern which, if left uncorrected, would have adversely affected safe operation of the plant.

4. The corrective steps that will be taken to avoid further violations:

The construction craft, engineering, and inspection personnel will be retrained on the importance of using good construction practices to assure proper conduit separation. This training will address the problems associated with excessively long conduit than can result in separation deviations if movement occurs.

Barriers are being added to the control panels in areas where maintaining the 6 inch separation is extremely difficult or not possible. In addition, a letter will be issued to site organizations alerting them to the separation requirements and the care that must be taken when routing cable in the control panels.

5. The date when full compliance will be achieved:

The above corrective actions will be completed by December 31, 1984.