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KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

April 22, 1985

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

APR 25 1985

KMLNRC 85-092
Re: Docket No. STN 50-482
Subj: Response to Request for Additional Information
on Wolf Creek Chemistry Program for Inspection
Report STN 50-482/85-07

Dear Mr. Denise:

This letter is in response to a request for additional information on the WCGS home office chemistry program made by Mr. Blair Nicholas, NRC Region IV, in a 4/18/85 telephone conversation with Mr. Craig Swartzendruber of my staff.

Inspection Report 50-482/85-07 provided additional clarification on Open Item 50-482/8440-1. Mr. Nicholas requested further information on the qualifications of the home office chemistry staff to aid him in closing out this item. Attachment 1 contains KG&E's response to this item. KG&E hopes that this information will aid in resolving the open item and satisfy any questions relating to the WCGS home office chemistry program.

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

Yours very truly,

Glenn L. Koester

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Attach
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JCummins, w/a
BNicholas, w/a

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With regard to NRC Open Item (482/8440-01) the following is submitted:

1. NRC Concern - "Update the FSAR to include the current corporate chemistry organization and manager of radiological services position qualifications."

KG&E Response - Nuclear Department policies and procedures include a description of the administrative organization structure for levels not placed in the FSAR. The level of detail chosen for the FSAR is relatively uniform. This information is readily available in documents as noted, and KG&E feels an FSAR change is unnecessary.

2. NRC Concern - "Development of position description for all corporate chemistry staff positions which define the specific duties and responsibilities of the position and incorporate at least as a minimum the ANSI 18.1-1971 personnel qualifications."

KG&E Response - KG&E has included herewith the job summaries for the two authorized Corporate chemistry positions. Both positions are presently staffed. A synopsis of the existing staff and comparison of their qualifications to ANSI 18.1-71 follows:

The Home Office Nuclear Chemistry Staff consists of a Nuclear Chemist/Engineer, Bruce Reischmann, and a Health Physics/Chemistry Technician, Lori Loney. They provide technical support services to the Wolf Creek Chemistry Department. The expertise and knowledge required to fill these positions has been gained through academic background, training, nuclear plant experience, and professional level experience in nuclear services.

Mr. Reischmann's and Ms. Loney's educational backgrounds and professional work experience both meet the ANSI 18.1 (March 8, 1971) guidelines for Technical Support Personnel:

- 1) Bachelor's Degree in Engineering or the Physical Sciences.
- 2) Three years of professional level experience in nuclear services, nuclear plant operation, or nuclear engineering.
- 3) Competent in technical matters.

Based upon Ms. Loney's job responsibilities at Wolf Creek Generating Station, she also meets the ANSI 18.1 (March 8, 1971) guideline for Professional-Technical personnel:

- 1) Minimum of five years experience in chemistry of which a minimum of one year shall be in radiochemistry.
- 2) A minimum of two years of this five years experience should be related technical training.
- 3) A maximum of four years of this five years experience may be fulfilled by related technical or academic training.

3. NRC Concern - "Development and approval of selection and qualification criteria implementing procedures for the determination of qualified personnel for corporate chemistry technical support personnel."

KG&E Response - The KG&E Nuclear Department utilizes the Administrative Policy Manual as its implementing procedure. Selection and qualification criteria are an interactive use of job summaries which state the desired qualifications, and available personnel's resumes. From these, the most qualified personnel are selected to be interviewed. The applicable procedures in this process are available for review by the NRC at KG&E's offices.

**KANSAS GAS AND ELECTRIC COMPANY
JOB SUMMARY**

JOB TITLE: Senior Engineer/
Engineering Specialist
(Nuclear Chemist) **DEPT/DIV:** Nuclear Services

GROUP: Radiological Services -
Chemistry

ORGANIZATIONAL RELATIONSHIPS:

Position Reports To: Manager Radiological Services

Position Directly Supervises:

Consultants

FUNCTION SUMMARY:

The Senior Engineer/Engineering Specialist is responsible for performing chemical engineering, chemistry assessment and waste management activities in support of WCGS.

PRIMARY DUTIES AND RESPONSIBILITIES INCLUDE:

1. Support Nuclear Plant Engineering by evaluating and reviewing design and modification for plant chemistry impacts.
2. Provide technical support to the operating plant chemistry program in the following areas:
 - a. Trend analysis of operating chemistry data to evaluate system performance and analysis adequacy, and identify current or potential problems with plant chemistry. Assure actions are taken to alleviate problems at their source.
 - b. Procedural guidance on actions to be taken for startup and shutdown modes and when out-of-specification conditions exist.
 - c. Assure that chemistry information from industry, federal, state and local sources is effectively distributed throughout the Company.
 - d. Review and evaluate chemistry specifications and methods of control to assure an active corrosion control effort consistent with corporate ALARA policy and steam generator protection programs.

(Continued on attached sheet)

SCOPE DATA:

1. Bachelor degree in Physical Sciences or Engineering.
2. Working knowledge of systems design.
3. Five years experience in chemical engineering.

REVIEWED: Craig Swartz / 4/18/85 **APPROVED:** Robert L. Duggan / 4/18/85

Date

Date

Senior Engineer/Engineering Specialist (Nuclear Chemist) (continued)

- e. Procedural guidance for optimization of chemistry specifications for radwaste system operation.
3. Provide chemistry support to the Environmental Management Group in the following areas:
- a. Lake chemistry data review and trend study
 - b. Assessment of various plant effluents and processes to determine their effect on the environment.
 - c. Hazardous Waste Chemistry input.
 - d. NPDES Permit Chemistry input.

KANSAS GAS AND ELECTRIC COMPANY
JOB SUMMARY

JOB TITLE: HP/Chem Tech III DEPT/DIV: Nuclear ServicesGROUP: Radiological Services -
Nuclear ChemistryORGANIZATIONAL RELATIONSHIPS:Position Reports To: Manager Radiological Services

Position Directly Supervises:

ConsultantsFUNCTION SUMMARY:

The HP/Chem Tech III is responsible for assisting in the performance of chemical engineering, chemistry assessment, and waste management activities in support of WCGS.

PRIMARY DUTIES AND RESPONSIBILITIES INCLUDE:

1. Provide support to the WCGS Chemistry Staff in the following areas:
 - a. Review and evaluate plant chemistry and radiochemistry data for trends and prepare chemical recommendations based upon the evaluation.
 - b. Assist in training site chemistry personnel in the areas of chemistry and radiochemistry.
 - c. Review the WCGS Chemistry Program for implementation and effectiveness.
 - d. Assist the Chemistry Staff, by providing extra coverage during startup testing and outages, as requested by the Site Chemist.
 - e. Review and disseminate technical information to the Site Chemist from published documents.

(Continued on attached sheet)

SCOPE DATA:

1. Bachelor of Science degree in Chemistry or closely related discipline.
2. Three years of experience in the field of chemistry/radiochemistry.
3. Working knowledge of nuclear power plant chemistry and systems.

REVIEWED: Cary Swartz 13/12/85
DateAPPROVED: Robert C. Johnson 3/17/85
Date

HP/CHEM TECH III (Continued)

- f. Attend professional meetings, seminars and symposia to maintain state-of-the-art awareness on chemistry and radiochemistry related subjects.
 - g. Evaluate plant modifications for chemistry impact and support plant changes necessary to improve plant chemistry.
2. Provide support to the Environmental Management Group in the following areas
- a. Lake chemistry data review and trend study
 - b. Assess various plant effluents and processes to determine the environmental effects.
 - c. Hazardous Waste Chemistry.
 - d. NPDES Permit Chemistry.