UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

MEMORANDUM FOR: L. Martin, Chief, Wolf Creek Task Force, Region IV

FROM: K. M. Jenfson, Project Inspector, Region II Wolf Creek Task Force

SUBJECT: WOLF CREEK (DN 50-482) ENFORCEMENT HISTORY FOR CALENDAR YEARS 1983 and 1984

A summation of those violations received by Docket Number 482, Kansas Gas and Electric Company, Wolf Creek, for the years 1983 and 1984 (through inspection report 84-30) is as follows:

Severity Levels

I - 0
II - 1
III- 1
IV - 11
V - 14

Regulatory Areas Cited:

10 CFR Appendix B Criterion

I - 2
II - 2
V - 18
VIII - 1
XI - 1
XV - 1

10 CRR 50.55a - 2

General Categories of Violations:

Failure to implement procedures	-	17
Failure to establish procedures	-	5
Failure to comply with 10 CFR 50.55a	-	2
others	-	3

A general description of each violation is provided below in decreasing order of severity:

REPORT	ITEM NUMBER	SEVERITY LEVEL
482-EA-84-87	None	SL2

Discrimination against a quality assurance employee.

482-EA-83-18	83-07-01	SL3

Failure to implement QA procedures involving the Refueling Water and Auxiliary Feedwater Systems turnovers from construction concerning a number of deficiencies that were not corrected prior to turnover.

482-83-04	83-04-01	SL4

Cleanliness and environmental controls applied towards installed components were not accomplished in accordance with an established procedure.

482-83-07	83-07-01	SL4

Failure of a licensee contractor to implement a quality program to control the performance of testing such as qualification tests and hydrostatic tests.

482-83-10	83-10-01	SL4

Failure to establish measures for controlled inspection procedures involving the performance of fillet welds on electrical raceways.

482-83-12	83-12-02	SL4

Failure to reject reactor coolant pressure boundry welds in accordance with 10 CFR 50.55a prescribed ASME III Boiler and Pressure Vessel Code requirements.

482-83-13	83-13-01	SL4

Failure to implement a quality assurance procedure which requires a minimum vision performance level for quality personnel.

482-83-16	83-16-01	SL4

Failure to implement a contractor procedure which delineates cope dimensions on accumulator structural steel support pieces.

482-83-18 83-18-01 SL4

Failure to control the installation of a safety related pipe hanger section.

482-83-32 83-32-01 SL4

Intimidation of a QA inspector by a licensee subcontractor.

482-83-34 83-34-01 SL4

Failure to implement a subcontractor procedure which specifies cable separation requirements for certain power cables.

482-83-39 83-39-01 SL4

Failure to implement a procedure which requires material preservation and equipment protection consistent with ANSI 45.2.3. Involved were the boric acid transfer pumps and numerous piping and instrumentation lines.

482-84-01 84-01-01 SL4

Failure to implement procedures which prevent the inadvertant use or installation of materials which do not conform to requirements. Involved was the installation of nonconforming material on component cooling water pumps.

482-83-11 83-11-01 SL5

Failure to adequately perform a quality inspection checklist which requires loading data to be permanently marked on pipe supports.

482-83-12 83-12-01 SL5

Failure to follow 10 CFR 50.55a prescribed ASME III Boiler and Pressure Vessel code requirements during the radiography of reactor coolant pressure boundry piping.

482-83-14 83-14-01 SL5

Failure to establish a procedure for activities affecting quality (realignment of the 125 volt DC Class IE system).

482-83-21 83-21-01 SL5

Failure to implement a procedure which required certification of traveler work operations during the installation of spent fuel storage racks.

482-83-25 83-25-01 SL5

Failure to follow subcontractor procedures established to control HVAC hanger welding.

482-83-30 83-30-01 SL5

Failure to establish procedures which adequately control steam generator secondary side chemistry.

482-83-30 83-30-02 SL5

Failure to establish procedures which adequately control the housekeeping activities of groups working in clean zones.

482-84-05 84-05-01 SL5

Failure to establish procedures which control the temporary use of nylon fasteners on electrical terminations.

482-84-08 84-08-01 SL5

Failure to implement procedures which require the Combined Review Group to review documentation for compliance with applicable codes and standards (concerning spool pieces and field welds).

482-84-08 84-08-02 SL5

Failure to implement a system turnover procedure which requires open documentation items to be listed on a turnover exception list.

482-84-08 84-08-03 SL5

Failure to implement a procedure which requires the system discrepancy lists to be updated after the resolution of delineated items.

482-84-09 84-09-01 SL5

Failure to control access to battery rooms during the weld preparation of piping.

482-84-20 84-20-01 SL5

Failure to implement a preoperational test procedure.

482-84-27 84-27-01 SL5

failure to implement a reactor coolant system preoperational test procedure.

K. M. Jenison
Project Inspector
Region II, Wolf Creek Task Force

KG&E QA CORRECTIVE ACTION REQUEST #19

FINDINGS - OVERVIEW

- MISSING WELD RECORD DOCUMENTATION
- WELD DEFICIENCIES
- WELDS NOT MADE/MISSING MATERIAL
- PRESENCE OF WELD INSPECTION DOCUMENTATION WITHOUT PRESENCE OF WELD (1 INSTANCE NOTED)
- VERIFICATION OF COMPLETED CORRECTIVE ACTION TO KG&E SURVEILLANCE REPORT S-372

AWS D1.1 STRUCTURAL STEEL WELDING CONCERNS

BACKGROUND INFORMATION

DATE	EVENT	COMMENTS
Sept. 1980	UNDERSIZED SOCKET WELDS	. Concern identified on small bore piping at another project. Performed sample inspection.
Sept. 1980	DIC CAR #7	. 100% reinspection of socket welds on small bore piping made prior to 6/80.
Mar. 1981	MECHANICAL/STRUCTURAL/ ELECTRICAL DEFICIENCY REPORTS	. Mechanical/Structural closed in May 1981 . Electrical addressed by CAR #9
Sept. 1981	KG&E QA Surv. Rpt. S-372	. Adverse trend associated with missing electrical support weld inspection documentation.
Sept. 1981	DIC CAR #9	. Provided corrective actions for KG&E Surv. Report S-372.
Aug. 1982 Feb. 1984	DIC CAR #19	. 100% Reinspection of fillet welds made prior to 4/1/81 on ASME and Special Scope PIPE hangers.
Feb. 1983	Random Reinspection Structural Steel Fillet Welds	. Inspection performed in all C-buildings. Unacceptable percentage of welds are deficient in the Auxiliary, Control & Fuel Buildings.
Mar. 1983	DIC CAR #29	. Obtain corrective actions of deficient welds noted above.
	Potential 50.55(e) Mar. 1983 → Withdraw Potential 50.55(e) Oct. 1983	
Aug. 1983	DIC CAR #31	. Not all MSSWR's can be located for "Q" welds in the Fuel, Reactor & ESWS Pumphouse. . NCR's generated for each safety related building or area with missing MSSWR's.

DOCUMENT RECONCILIATION TASK — 8/13/84 → INSPECTION VERIFICATION PLAN — 8-17-84

POTENTIAL 50.55(e) 9-18-84
KG&E QA CAR # 19

KCSE QA CORRECTIVE ACTION REQUEST #19

PROGRAM OBJECTIVES:

- DOCUMENT A CONSOLIDATED PROJECT PLAN

- ASSURE BY OBJECTIVE EVIDENCE, THAT AWS D1.1 SAFETY RELATED STRUCTURAL STEEL WELDING COMPLIES WITH ALL QUALITY CRITERIA.

- ASSURE THAT INSPECTION DOCUMENTATION IS:

  AVAILABLE
  COMPLETE
  REFLECTS APPROPRIATE INFORMATION
  TRACEABLE

- EVALUATE OTHER AWS D1.1 SAFETY RELATED WELDING ACTIVITIES.

FORM 1127 REV 1-67

INTEROFFICE CORRESPONDENCE

TO: G.L. Fouts

KQLKWC 84-002

FROM: R.M. Grant

DATE: October 17, 1984

SUBJECT: Corrective Action Request (CAR) No. 19

Attached is Corrective Action Request (CAR) #19 which is being issued to obtain corrective actions to problems associated with safety-related AWS D1.1 structural steel welding.

Please respond to this Corrective Action Request by completing Section 5 of the subject CAR. Your schedule for implementing corrective actions and an explanation of any actions you have already taken should be submitted to me by October 24, 1984.

RMG/dkb

cc: K.R. Brown
G.L. Koester
F.J. Duldy
W.J. Rudolph II
C.E. Parry
C.G. Patrick

A-7

NQF-6B Rev. 2/84

TE 58531

WOLF CREEK GENERATING STATION

CORRECTIVE ACTION REQUEST

CAR NO. 19

1. CONDITION DESCRIPTION:

See Attached.

2. RESPONSIBLE ORGANIZATION:

KG&E Construction

3. CAUSE OF CONDITION:

QA Program breakdown associated with safety-related AWS D1.1 structural steel welding.

4. RECOMMENDED CORRECTIVE ACTION:

See Attached.

Reviewer 10-17-84 Date

Quality Branch Representative 10-17-84 Date

5. SCHEDULE FOR IMPLEMENTATION OF ACTION:

Responsible Supervisor Date

6. NRC REPORTABLE: (Yes) No
9/18/84 See Attached Telephone Call Record

7. STOP WORK ACTION TAKEN: Yes (No)
If Yes, Report # _____

8. CORRECTIVE ACTION VERIFIED - Method of Verification:

Quality Branch Representative Date

Supervisor Date

9. CAR CLOSED: Yes

Quality Branch Representative Date

Supervisor Date

10. APPROVAL _____ DATE _____
Director - Quality

I. CONDITION DESCRIPTION

A. Objectives

- To document a consolidated project plan for the identification, evaluation and resolution of problems associated with Safety-Related AWS D1.1 Welding.

- To provide assurance, based on objective evidence, that AWS D1.1 Welding of Safety-Related Structural Steel complies with all Quality Criteria as specified in the related design documents and is within the tolerances of acceptable deviations as determined by the Architect - Engineer.

- To provide assurance that the documentation which supports the inspection of safety related structural steel welds is:

  - Available
  - Complete
  - Reflects appropriate information
  - Traceable to the item or activity

- To evaluate supporting elements of the DIC Quality Assurance Program to ensure that those elements were adequately and effectively implemented to demonstrate that the DIC welding of safety related structural steel, HVAC Supports, Electrical Supports, Pipe Whip Restraints and any other AWS D1.1 safety related welding activities were in compliance with the FSAR (i.e. AWS D1.1 - 1975) and the Design and Construction QA Program Manual, Section 17.1.B.

B. Definitions

Joint - A structural steel welded connection. A joint may consist of numerous welds. A joint may also be referred to as a connection.

Weld - A continuous length of weld material with only one start and one stop.

MSSWR - Miscellaneous Structural Steel Weld Record; a form used by DIC to document installation and inspection data for welds made to structural steel.

AWS D1.1 - American Welding Society's Structural Welding Code. This code covers welding requirements applicable to welded structures. It is to be used in conjunction with any complementary code or specification for the design and construction of steel structures.

Miscellaneous Structural Steel - See Attachment B for Complete Definition.

Structurally Significant Welds - See Attachment B for Complete Definition.

C. Background Information

- KG&E Surveillance Report S-372 (October, 1981) identified a Quality Program breakdown due to the following deficiencies:

  - Missing inspection documentation
  - Incomplete/improper resolution of identified electrical, mechanical and structural weld documentation deficiencies.

  The Surveillance Report resulted in the issuance of DIC CAR #9. CAR #9 pertained exclusively to the major finding of the Surveillance Report, that being electrical support weld inspection documentation. An agreement between KG&E and DIC Quality Management was reached that required KG&E to issue a CAR if the DIC resolution was unsatisfactory to KG&E.

- DIC CAR No. 1-E-009 (October, 1981) was subsequently issued to address the electrical support weld inspection documentation concerns identified in the KG&E Surveillance Report. The root causes of the problems identified in the KG&E Surveillance Report were determined by DIC to be:

  - The lack of notification by the responsible craft to Quality inspectors that welding activity was scheduled to commence.
  - Improper processing and filing of weld records.
  - The existance of a single part document as opposed to a triplicate type form to record inspections.

  The corrective measures taken by DIC involved the retraining of construction engineering personnel and the placement of limitations on the authorization level required to initiate the dispositions to Deficiency Reports. The CAR was closed in November, 1982.

- DIC CAR 1-W-0029 (March, 1983) was initiated to address some weld inspection inconsistancies in the Auxiliary, Control and Fuel Buildings. To investigate the extent of the problem 241 welds were inspected of which 147 were identified by the inspectors as deficient. To resolve the condition identified on the CAR, NCR 1SN10381PW was generated. The evaluation of the NCR involved another inspection by Welding Engineering which resulted in the determination that only 22 welds exhibited potentially significant conditions and were subsequently evaluated by the Architect - Engineer and dispositioned "use-as-is". Based on the NCR and its closure, DIC closed CAR 1-W-0029 in October, 1983.

- DIC CAR 1-C-0031 (August, 1983) states in part:

  "MSSWRs used to document safety related structural steel welded connections through out "Q" designated areas is inadequate. A sample survey made by (DIC) Q.E. has shown 16.4% of the required MSSWRs cannot be located for all "Q" welds in the Fuel Bldg. A survey of 6 erection/design drawings in the Reactor Bldg revealed 24% of the welds are missing documentation. In addition, M/W Quality has initiated a NCR (1SN11957CW) to document 42 missing MSSWRs for welds in the ESWS Pumphouse."

The CAR was dispositioned to write an NCR for each safety related building to address the missing MSSWR's. Although the CAR remains open, the proposed justification for closure is based in part on the closure of DIC CAR 1-W-0029.

- Current Project Actions

  - Document Reconciliation Task: On August 13, 1984, a document reconciliation effort was initiated at the direction of project management to determine which safety related structural steel welds identified on design drawings were lacking inspection documentation in the form of MSSWRs.

  - Inspection Verification Plan: On August 17, 1984, an inspection verification effort was initiated at the direction of project management to provide an accurate assessment of the "as-built" conditions of safety related structural steel welded connections with unretrievable MSSWR's. These activities are being performed by a combined team of DIC and Architect - Engineer AWS Certified Welding Inspectors under direct supervision of KG&E Construction QC. These activities are being performed in accordance with written instructions issued by KG&E Construction QC which reflect the criteria of AWS D1.1-1975 and the applicable Architect - Engineer design documents. The results of these verifications and the review of Surveillance Report S-372 have caused the findings in Section E of this report to be issued.

D. Requirements

The welding of safety related structural steel connections at WCGS is governed by welding code AWS D1.1-1975. The WCGS FSAR invokes this code for each safety related structure. In addition, SNUPPS project specification 10466-C-122 (Q) Rev. Ø through 14 entitled "Technical Specification for Contract for Erection of Structural Steel for the (SNUPPS) Power Plant" and specification 10466-C-132(Q), Rev. Ø through 8 titled "Technical Specification for Erecting Miscellaneous Metal for the Standardized Nuclear Unit Power Plant System (SNUPPS)" requires structural steel welds to be performed in accordance with AWS D1.1-1975, with exceptions in the criteria for undercut (para. 8.5.2) and weld convexity (para. 8.5.3).

E. Findings - Impacts - Recommended Corrective Actions

The five findings listed below were identified during the two WCGS management assessments described in the 'Background Information' section of this report and a review of Surveillance Report S-372 by KG&E QA. Collectively, these represent a breakdown of the constructor's Quality Assurance program. This condition was caused by an apparent inconsistent application of weld inspection criteria, failure to implement procedural requirements for documenting inspections, and failure to implement effective corrective actions for identified deficiencies.

Finding #1: The results of the Document Reconciliation Task indicated that 1589 of 6016 MSSWRs for safety related structural steel welds are missing. (See Attachment B)

Impact: Without the documentation for the structural welds, the following areas are indeterminate:

- Welder identification and qualification
- Filler metal traceability
- Visual inspection results
- Qualified weld procedures specification used

Recommended Corrective Actions: Actions 1a through 1h below will adequately address all of the concerns identified in Finding #1 and the "root cause" concerns associated with Finding #2.

1a. Based on DIC program requirements, assure that all of the welders and welding procedure specifications were qualified to AWS D1.1 - 1975.

1b. Review the DIC program for the purchase and control of filler material to ensure that only acceptable filler material was used in safety related structural steel welds.

1c. Evaluate the adequacy of the DIC inspection criteria and procedures to determine if these elements could have adversely impacted either the results of the initial inspections or the results of the verification plan. Document and provide this evaluation to KG&E QA for review prior to any additional inspection implementation. Any changes in inspection criteria and procedures shall be provided to KG&E QA for review.

1d. Obtain a documented evaluation to determine the validity of inspections performed with the presence of paint on the weld.

1e. Utilize personnel certified to ANSI N45.2.6 - 1978 for the inspection of safety-related structural steel welds. Inspections shall be performed in accordance with the DIC Quality Program and training shall be performed and documented to assure that inspectors are cognizant of the DIC Quality Inspection program requirements.

1f. Perform a 100% reinspection of all structurally significant safety-related structural steel welds with missing MSSWR's. The identification of "structurally significant" welds shall be made by the Architect - Engineer (See Attachment B). Inspect the welds per recommendations 1c, 1d, 1e, 1g, 1h and 2a.

1g. Use an NCR to obtain and document a suitability for service evaluation of inaccessable welds.

1h. Report all identified deficiencies on an NCR.

* *

Finding #2: An inspection verification effort of safety-related structural steel welding, undertaken by AWS certifed weld inspectors identified several areas of deficiencies. These deficiencies have been categorized below:

- Undersized welds
- Weld defects
- Incorrect configuration
- Weld undercut
- Weld undercut

Impact: These deficiencies could jeopardize the structural integrity of the connection.

Recommended Corrective Actions: Actions 2a through 2d below will adequately address all of the concerns identified in Finding #2 and the investigative actions required by Finding #5.

2a. Determine and document the "root cause" of the previous acceptance of deficient structural welds. Analyze the HVAC Support, Electrical Support, Pipe-Whip Restraint and any other safety-related program utilizing AWS D1.1 Welding to ensure that the same "root causes" inherent in the structural steel welding program were not generic to other programs.

2b. Perform a 100% reinspection of all structurally significant safety-related structural steel welds having MSSWR's. The identification of "structurally significant" welds shall be made by the Architect - Engineer (See Attachment B). Inspect the welds per recommendations 1c, 1d, 1e, 1g, 1h, and 2a.

2c. Evaluate the results of the completed Inspection Verification Plan against the acceptance criteria used in Action 1c.

2d. Any identified deficiencies shall be documented on an NCR.

* *

Finding #3: A small number of safety-related structural steel welds were not made or had missing material.

Impact: The structural integrity has possibly been jeopardized.

Recommended Corrective Action: The following action and the engineering disposition will adequately address Finding #3.

3a. Forward the "as-built" information to the Architect - Engineer via an NCR to obtain an engineering evaluation and disposition.

* *

Finding #4: One (1) weld was documented as having been inspected when in reality the weld was not made. (Ref. NCR ISN2849SCH)

Impact: The inspector who made the error could have improperly documented other welds. The structural integrity has possibly been jeopardized.

Recommended Corrective Action: The following action will adequately address Finding #4.

4a. Investigate the concern to determine the root cause of the error. Immediately notify KG&E Quality Assurance if any other problems of this nature are identified. Document the investigative actions. The notification of KG&E QA shall not preclude the issuance of an NCR.

* *

Finding #5: Objective evidence that the mechanical and structural welding inspection/documentation problems identified in KG&E QA Surveillance Report S-372 were rectified has not been provided.

Impact: There is a possibility that the mechanical and structural support welding inspection/documentation problems identified in the Surveillance Report were not corrected.

Recommended Corrective Action: The following action will adequately address Finding #5.

5a. Provide objective evidence that the mechanical and structural support welding inspection/documentation problems identified in Surveillance Report S-372 have been corrected. If such evidence is not available, research the extent of the problem and take the appropriate remedial actions.

F. Recommended Corrective Action Flow Diagrams

See Attachment C.

ATTACHMENT A

DATE: 9/18/84

TIME: 3:00

LE: KSLNRC

TE: 40675-K152

TE: 53564-152

TELEPHONE CALL RECORD

TO: Lawrence Martin

FROM: GMaynard, BRudolph, MLindsay, CParry

COMPANY: NRC Region IV

ADDRESS: Arlington, Texas

TELEPHONE NO.: 817/860-8100

(use ink)

SUBJECT: Potential 10CFR50.55(e) Inspection of Welds.

We informed Mr. Martin that during our re-inspection of welds for which we had no inspection records, we identified 4 welds on the containment cooler platfrom and 4 lateral supports for the incore instrumentation tubing that were not installed. We are investigating to determine whether or not the condition was documented and why they had not been installed.

ACTION REQUIRED AND DATE: Licensing coordinate 30-day report - due: 10/18/84

DISTRIBUTION:

G Koester	H Bundy/B Bartlett/W Guldemond	
F Rhodes	F Duddy	R Pogue/F Zaval
M Williams	G Fouts	C Parry/M Lindsay
R Hagan	R Grant	J Bailey/D Prichard
M Johnson	W Rudolph	A Beat
G Rathbun	R Glover	S Seiken
L Stevens	G Baker	
F Field	B Meyer	

G W Maynard
(signature)

A-8

ATTACHMENT B

1. Definition of Miscellaneous Structural Steel:

Miscellaneous Structural Steel is divided into two (2) parts for the purposes of this CAR.

A. Main Frame and Associated Members:

Main frame welds are those welds on structural steel connections which support the main building floors (concrete or grating) and roofs. For efficiency, these connections are identified on a "per drawing" basis rather than categorizing each piece of steel individually. Therefore, it is inevitable that this category will include certain "associated" connections, such as, welds other than those which support main building floors and roof, which are depicted on drawings primarily showing main building floor and roof steel.

B. Miscellaneous:

Miscellaneous welds connect steel which does not support main building floors or roofs (i.e., all structural steel welds not classified as main frame or associated welds). This does not include hand-rails, toe-plates, and similar items.

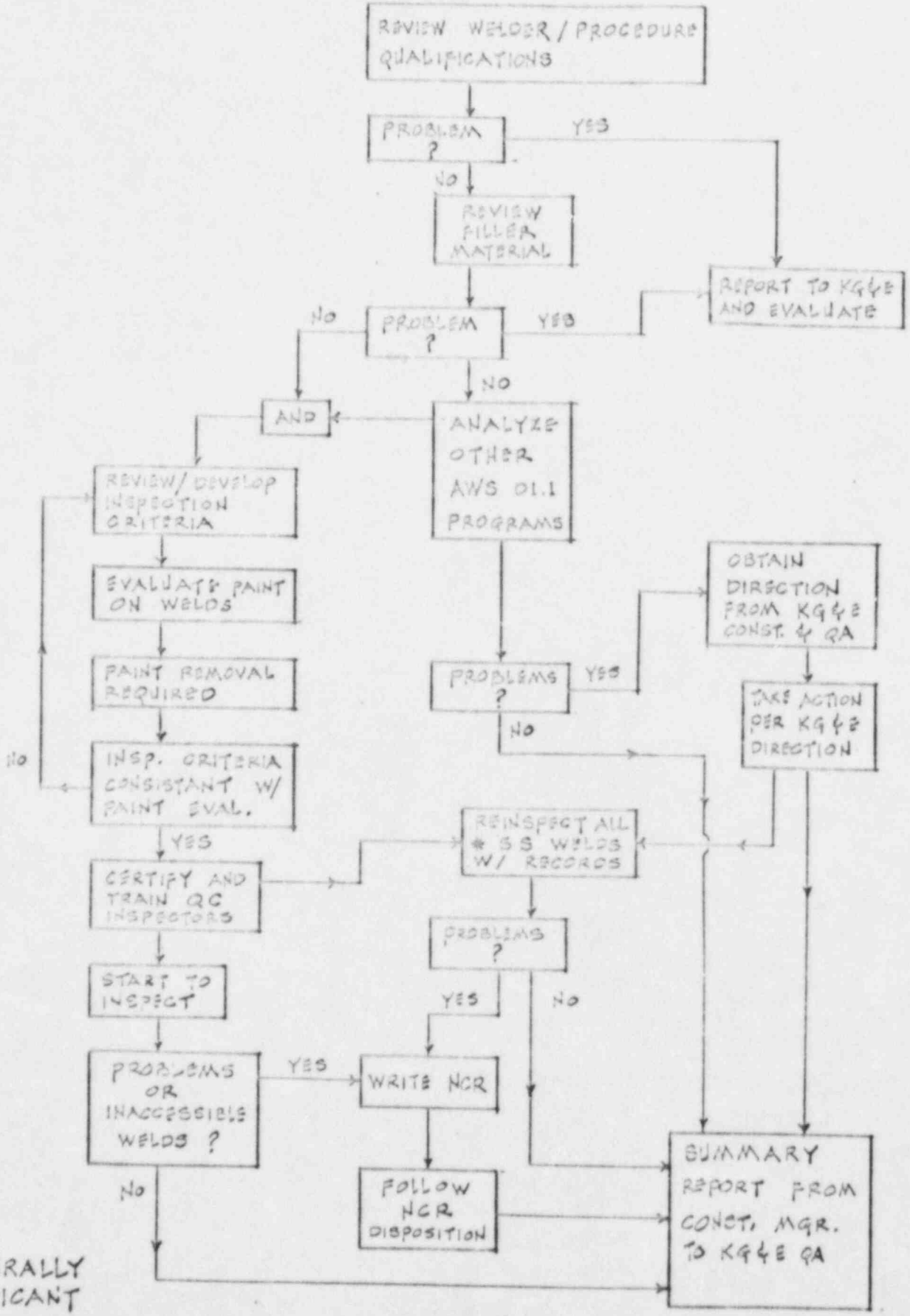
2. Definition of Structurally Significant Welds:

Those welds which are required in the completed building structure to support and protect safety related equipment and building components. Welds for temporary supports, non-safety related supports, hand-rails, toe-plates, and similar items are not considered to be structurally significant by this definition.

KG&E CAR 19 ATTACHMENT C-1

RECOMMENDED CORRECTIVE ACTION FLOW DIAGRAM

FINDING #1 & 2

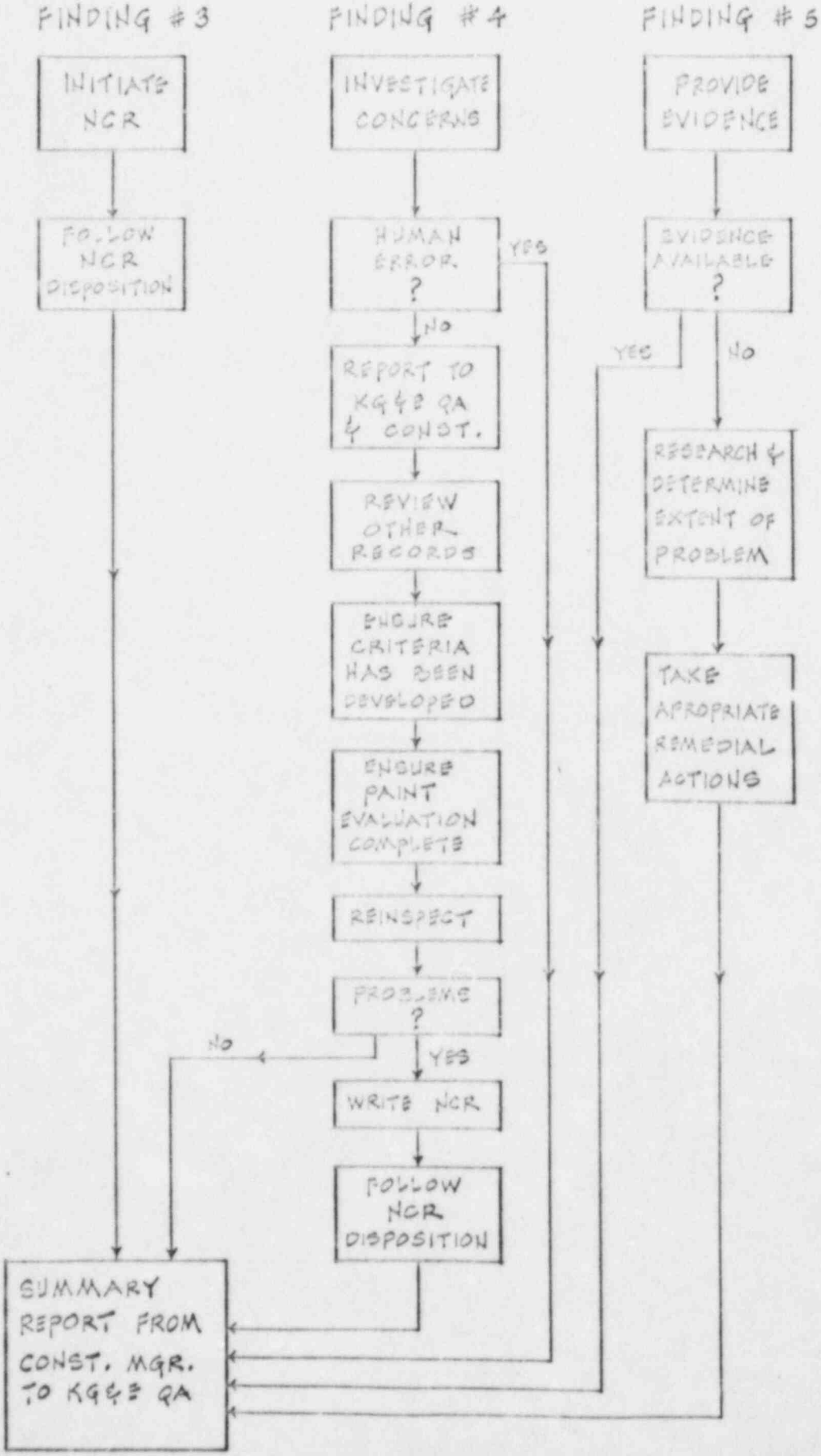


* = STRUCTURALLY SIGNIFICANT

KG&E CAR 19

ATTACHMENT C-2

RECOMMENDED CORRECTIVE ACTION FLOW DIAGRAM



MANAGEMENT PLAN OVERVIEW

- Verify hardware & programatic aspects of safety related activities utilizing AWS D1.1 welding are in conformance with the FSAR

- Implement in strict accordance with CAR 19

- Numbering system utilized in the plan

  Example: 1. - Finding Number in CAR

  1a. - Recommended corrective action in CAR

  1a-1 - Actions planned in management plan

FINDING #1 - MISSING MSSWR'S

ACTIONS

a. Verify welders & procedures qualified to AWS D1.1-75

b. Verify purchase & control of filler & base material was acceptable

c. Verify inspection criteria and procedures did not adversely impact inspection results

d. Document validity of inspection for CAR 19 attributes with the presence of paint on welds

e. Utilize personnel certified to ANSI N45.2.6 - 1978 for the CAR 19 inspection verification plan

f. Perform a 100% reinspection of structurally significant welds with missing records

g. Obtain and document a suitability for service evaluation of inaccessable welds

h. Initiate an NCR for all identified deficiencies

FINDING #2 - INSPECTION VERIFICATION PLAN HAS IDENTIFIED SEVERAL AREAS OF DEFICIENCIES

ACTIONS

a. Determine "Root Cause" of previous acceptance of deficient structural welds and analyze other AWS programs to determine if "Root Cause" was generic to those programs.

b. Perform a 100% reinspection of structurally significant welds having MSSWR's

c. Evaluate the results of the completed Inspection Verification Plan against the acceptance criteria

d. Initiate the NCR for all identified deficiencies

FINDING # 3 - MISSING MATERIAL AND WELDS

a. A/E perform "As Built" engineering evaluation and disposition

b. Verify the incorporation of design changes

c. Evaluate for Root Cause determination

FINDING # 4 - MISSING WELD(S) WITH EXISTING DOCUMENTATION

a. Investigate to determine "Root Cause"

- Evaluate CAR 19 inspection verification plan results for patterns
- Identify further actions as required

FINDING #5 - OBJECTIVE EVIDENCE THAT MECHANICAL AND STRUCTURAL WELDING/DOCUMENTATION IN KG&E QA SURVEILLANCE REPORT S-372 HAS NOT BEEN PROVIDED

a. Provide objective evidence for:

- Civil deficiency reports in S-372
- Mechanical deficiency reports in S-372

FORM 1172 REV 1-67

INTEROFFICE CORRESPONDENCE

TO: R. M. Grant KWCLKQW 84-120

FROM: G. L. Pouts

DATE: October 26, 1984

SUBJECT: Wolf Creek Generating Station
Management Plan for KG&E
Corrective Action Request 19 - Resolution

REFERENCE: (a) KQLKWC 84-002

In response to the reference letter I am submitting the KG&E Management Plan for the resolution of CAR #19. This plan differs from the plan initially submitted by Daniel in their letter CLKWC 84-1045 to me on October 19th in that KG&E has incorporated Bechtel Engineering comments into actions assigned to Bechtel. This comprehensive plan represents the efforts of Bechtel, Daniel and KG&E and has been reviewed and approved by Frank Duddy and myself.

Please advise me if you have any questions regarding this response.

Gary L. Pouts
Assistant Project Director

GLF/mh

Attachments: (1) Corrective Action Request #19
(2) KG&E Management Plan dated 10/26/84
(3) KG&E Management Plan Schedule dated 10/26/84

cc: F. J. Duddy w/a
G. L. Koester w/a
W. J. Rudolph w/a
J. G. Nelson w/a
O. Maynard w/a
J. A. Bailey w/a
J. G. Berra-DIC w/a

RESPONSE REQUESTED: ___ YES X NO

A-10

WOLF CREEK GENERATING STATION

CORRECTIVE ACTION REQUEST

CAR NO. 19

1. CONDITION DESCRIPTION:

See Attached.

2. RESPONSIBLE ORGANIZATION:

KG&E Construction

3. CAUSE OF CONDITION:

QA Program breakdown associated with safety-related AWS D1.1 structural steel welding.

4. RECOMMENDED CORRECTIVE ACTION:

See Attached.

Reviewer — Date 10-17-84

Quality Branch Representative — Date 10-17-84

5. SCHEDULE FOR IMPLEMENTATION OF ACTION:

See attached KG&E Management Plan Schedule dated 10/26/84

Responsible Supervisor — Date 10-26-84

6. NRC REPORTABLE: (Yes) No
9/18/84 See Attached Telephone Call Record

7. STOP WORK ACTION TAKEN: Yes (No)
If Yes, Report #

8. CORRECTIVE ACTION VERIFIED - Method of Verification:

Quality Branch Representative — Date

Supervisor — Date

9. CAR CLOSED: Yes

Quality Branch Representative — Date

Supervisor — Date

10. APPROVAL

Director - Quality — DATE

17-11