



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. ROESTER
VICE PRESIDENT - NUCLEAR

August 23, 1985

Mr. R.P. Denise, Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 85-203
Re: Docket No. 50-482
Subj: Response to Inspection Report STN 50-482/85-25

Dear Mr. Denise:

This letter is written in response to your letter of July 26, 1985, which transmitted Inspection Report STN 50-482/85-25. As requested, the violation (482/8525-01), identified in the Inspection Report is being addressed in four parts.

- a) The reason for the violation, if admitted;
- b) The corrective steps which have been taken and the results achieved;
- c) Corrective steps which will be taken to avoid further violations; and
- d) The date when full compliance will be achieved.

Violation: Lack of Records Control for Plant Modification Packages

Finding:

10 CFR 50, Appendix B, Criterion II, as implemented by Wolf Creek Plant Quality Assurance Program, FSAR Section 17.2.3, requires that control be provided over activities affecting the quality of the identified structures systems, and components, to an extent consistent with their importance to safety.

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Contrary to the above, the Region III inspector identified a lack of control of the Wolf Creek modification process. Examples noted during the review of eight modification packages are as follows:

1. Records or portions of records from three modification packages were missing from the QA records vault and were not located during this inspection.
2. Two modification packages contained documentation which did not indicate the required signatures.
3. Two modification packages contained conflicts regarding the safety classification of the modifications.

Reponse:

a) The reason for the violation, if admitted;

1. Records or portions of records from three modification packages were missing from the QA records vault and were not located during this inspection.

Response:

Records or portions of records were not located during the inspection due to personnel unfamiliarity with the PMR and document retention processes. The original PMRs referenced by the Work Requests are maintained in Management Systems Document Control (MSDC). All of the identified PMRs were in MSDC except the original of PMR W084-KE028 which was in the validation and closeout process. The 10CFR 50.59 evaluation for PMR 384 was performed by the A/E and is included in the PMR package. In these cases, a separate 50.59 evaluation by the PSRC is not required. The required PSRC review of the existing 50.59 was performed on February 22, 1985 and is documented in the WR91002-85 package.

2. Two modification packages contained documentation which did not indicate the required signatures.

Response:

WR4279-85 was in the review cycle and was not able to be located during the inspection period. A PMR with a status of AP-7 indicates the work is complete, however the PMR and associated documents may still be in the review cycle and not closed out. The review cycle is now complete and the work package contains the required signatures. The missing QC signature on WR91206-85 was caused by a failure to properly follow procedures.

3. Two modification packages contained conflicts regarding the safety classification of the modifications.

Response:

Work Request WR 4604-85 was initiated for installation of neutron shield water bags. The initiator inappropriately marked the work request as non-safety related. However, the water bags were subsequently removed and replaced with water cans, thus this modification no longer exists in the plant. Work Request WR 2986-85 should have been designated safety related. However, the field installation was performed by the vendor on a rework plan, which identified the equipment as "Q" and used the vendors quality program.

- b) The corrective steps which have been taken and the results achieved:

As a result of the NRC inspection conducted on May 20, 1985, the overall Plant Modification Request program was reviewed. A Task Force was developed which included members from each group who were involved in the PMR implementation, closeout and verification processes. As a result of the Task Force, proposed changes have been developed for KGP-1131, "Plant Modification Process" and are in a concurrent review and approval process. The Operations Branch Plant Modification Process program was also completely revised and the implementing procedure ADM 01-042, "Plant Modification Request Implementation" was totally rewritten and is in the review and approval process.

The revised program provides:

- PSRC review of Safety Evaluations
- Plant Manager signature for implementation approval
- Traceability from Plant Modification Request (PMR) package to all implementing Work Requests and from each Work Request to the PMR
- Index for package contents
- Instructions to provide for adequate closeout documentation and verification

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The following work documents discussed above shall be evaluated by Quality Engineering for proper safety classification. If improper classification is indicated the impact on the subject installations shall be evaluated and corrective actions shall be taken as required.

- WR 4604-85 designated as non-safety related
- WR 02986-85 designated as non-safety related
- WR 91206-85 lacks QE Final Review Signature (Block 35)

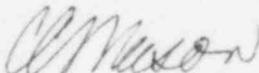
- c) The corrective steps which will be taken to avoid further violations:

The revised PMR implementation procedures provide stringent controls for PMR implementation, closeout, and verification. Following approval of the implementing procedures and prior to implementation of the revised program, training in the program requirements will be given to appropriate personnel involved in the PMR implementation, closeout and verification processes.

- d) Date when full compliance will be achieved:

Full compliance will be achieved by September 30, 1985.

Yours very truly,



for
Glenn L. Koester
Vice President, Nuclear

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cc: PO'Connor (2)
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