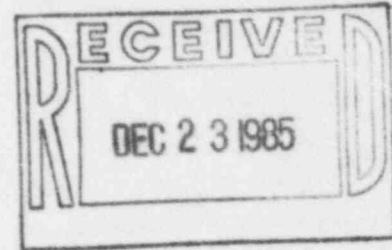




KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

December 13, 1985



Mr. E. H. Johnson, Acting Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

KMLNRC 85-271
RE: Docket No. STN 50-482
SUBJ: Response to Inspection Report STN 50-482/85-33

Dear Mr. Johnson:

This letter is written in response to your letter of November 14, 1985, which transmitted Inspection Report STN 50-482/85-33. As requested, the violation (482/8533-01) identified in the Inspection Report is being addressed in four parts.

- (a) The reason for the violations 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.

1. Violation (482/85-33-01) Failure to Follow Procedures

Finding:

Technical Specification 6.8, "Procedures and Programs" states that written procedures shall be established, implemented, and maintained covering the activities related to the emergency plan implementation.

a. Distribution Control System Procedure

Procedure KP-1032, Section 7.3.5-7.3.7 states that if an acknowledgement has not been received within 30 days of the transmittal date of the emergency plan or emergency plan

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implementation procedures (EPP), a reminder notice shall be sent to the recipient, to files, and a copy placed in the transmittal file.

Contrary to the above, letters had not been sent to recipients of the emergency plan and EPPS that failed to return the acknowledgment form.

b. Emergency Preparedness Program Maintenance

Procedure EPP 02-1.1, Revision 1, Section 4.3.2, states "An evaluation shall be conducted of proposed changes to assure compliance with the requirements of 10 CFR 50.54(q)." Section 4.3.2.1 states "Such an evaluation shall be conducted by the originator of the proposed change and documented."

Contrary to the above, there were no evaluation records for the evaluation performed on EPP changes submitted to the NRC on May 15, 1985, and June 27, 1985.

Reason for Violation if Admitted:

- a. The investigation into this portion of the violation revealed that reminder notices were not sent to recipients because Management Systems personnel were not fulfilling the requirements of this portion of procedure KP-1032.
- b. Part b of this violation occurred because, contrary to Sections 4.3.2 and 4.3.2.1 of procedure EPP 02-1.1, Rev. 1, records of the evaluation performed on EPP changes submitted to the NRC on May 15, 1985 and June 27, 1985 were not kept.

Corrective Steps Which Have Been Taken and Results Achieved:

- a. Procedure KP-1032 has been revised to reflect the following:
 1. The requirement to discontinue distribution to recipients who fail to acknowledge transmittal was deleted. This requirement was inappropriate for Emergency Plan procedure distribution.
 2. Responsibility for corrective action on delinquent acknowledgements from non-nuclear department and non-KG&E recipients has been transferred to the Management System Manager to allow more diligent followup.

In addition, the Emergency Plan Procedure distribution matrix has been added to the Project Document Control distribution matrix and an outstanding acknowledgements have been verified for receipt.

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- b. EPP 02-1.1 has been revised to incorporate sufficient direction to ensure that 10 CFR 50.54(q) is complied with for future Emergency Plan Procedure (EPP) revisions.

Section 7.4 of EPP 02-1.1, Revision 2, assigns responsibility for the review of each revision request pursuant to 10 CFR 50.54(q) to the Emergency Planning Coordinator (EPC). Attachment 2 of this procedure includes a checklist for completion of this review by the EPC. This attachment accompanies any EPP revisions through the review and approval cycle.

Revision 2 of EPP 02-1.1 has been used for all revision to EPP's since its release date of 9/19/85.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

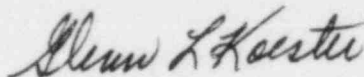
- a. The acknowledgement tracking responsibility will be transferred to a group designed specifically for the task of transmittal tracking. An automated tracking system has been implemented to provide a monitoring mechanism of transmittal acknowledgement. Document control distribution personnel are being trained on the new procedure and the new automated system. Recipients are also being trained on the new procedure.
- b. No further action is required.

Date When Full Compliance Will Be Achieved:

- a. The revised system has already been implemented. However, full compliance will be achieved by January 1, 1986 to allow for training of all document control personnel.
- b. Full compliance has been achieved.

Please contact me or Mr. Otto Maynard of my staff if you have any questions concerning this response.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:see

cc: PO'Connor (2)
JCummins
JTaylor