

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

June 15, 1988

WM 88-0165

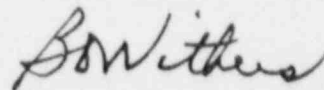
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject: Docket No. 50-482: Response to Violation 482/8815-01  
Reference: Letter dated May 16, 1988 from L. J. Callan, NRC to  
B. D. Withers, WCNOG

Gentlemen:

Attached is a detailed response to violation 482/8815-01 which was documented in the Reference. Violation 482/8815-01 concerns a failure to follow procedures. If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,



Bart D. Withers  
President and  
Chief Executive Officer

BDW/jad

Attachment

cc: B. L. Bartlett (NRC), w/a  
D. D. Chamberlain (NRC), w/a  
R. D. Martin (NRC), w/a  
P. W. O'Connor (NRC), w/a (2)

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Failure to Follow Procedures in Requisitioning

Criterion V of Appendix B to 10 CFR Part 50 and Section 17.2.5.1 of the Wolf Creek Updated Safety Analysis Report, which is the approved QA plan, require that activities affecting quality shall be accomplished in accordance with documented instructions.

- A. Wolf Creek Nuclear Operating Corporation (WCNOC) Quality Assurance Procedure (QAP) 4.1, "Processing of Procurement and Related Documents," paragraph 7.1.4.2.B and WCNOC Procedure KP-2140, "Material and Services Procurement," paragraph 6.4.8.6.2 both require that purchase requisitions for ASME Code items from Westinghouse have adequate specification of required certification documentation such as ASME Code Data Reports.

Contrary to the above, WCNOC Purchase Requisition 100966 dated June 9, 1987, failed to identify that two packing box assemblies (Fisher Controls Part No. 21A244X022) were ASME pressure boundary parts for which ASME Code Data Reports are required.

- B. WCNOC QAP W4.1, "QE Processing of Procurement Documents," Revision 0, paragraph 7.2.3.C requires that purchase requisitions for ASME Code items have adequate specification of required certification documentation such as ASME Code Data Reports.

Contrary to the above, WCNOC Purchase Requisition 51534 dated July 28, 1984, failed to identify that five valve stem assemblies (i.e., two Yarway Corporation Part No. 058-106186-03, one Yarway Corporation Part No. 058-106186-02, and two Yarway Corporation Part No. 058-106186-01) required ASME Code Data Reports.

- C. WCNOC QAP 4.1, paragraph 7.1.3.B, requires that purchase requisitions include invoked or referenced specifications along with applicable revision number.

Contrary to the above, purchase requisition numbers 102555, 90943, 104746, 105358, 105154, and 104913 did not include the applicable Westinghouse E-Specification revision number. This sampling was performed because the same condition had been observed on purchase requisition 100966, discussed above.

Reason for Violation

- A. WCNOC procedure KGP-1250 "Procurement" revision 3 paragraph 6.9.2 and KP-2140 "Material and Services Procurement" revision 1, paragraph 6.1.3.1 state "Items procured from Westinghouse using the Westinghouse Spare Parts Report will be classified for procurement in accordance with Westinghouse Procedure OPR 405-5, latest revision, in lieu of procurement classification under the five-level system."

The Packing Box Assembly was procured from Westinghouse utilizing Westinghouse procedure OPR 405-5, "Renewal Parts Procurement and Supply System" which provides for Westinghouse to classify parts according to their function and importance to safety. WCNOC personnel failed to recognize the packing box assembly as an ASME pressure boundary part and therefore did not identify that an ASME Code Data Report was required.

The Packing Box Assembly was inadvertently classified by Westinghouse as a Code "D" item which does not require submittal of ASME documentation in lieu of the correct classification, which was Code "A" for ASME pressure boundary parts. Westinghouse supplier, Fisher Controls, also erred by failing to recognize the Westinghouse specification required an ASME item and only utilized the erroneous Westinghouse Code "D" classification and provided a commercial grade part.

- B. WCNOC QAP W4.1, "QE Processing of Procurement and Related Documents", revision 0, paragraph 7.2.3.C states the Quality Engineer shall review the Purchase Requisition (PR) for inclusion of appropriate ASME Certified Material Test Reports, Certificates of Compliance and Code Data Reports.

Review of the quality records generated in 1984 for procurement of the stem assemblies (PR 51534 and QA Review #346) clearly indicate that WCNOC personnel recognized the stem assemblies as ASME Section III pressure boundary items. However, by reviewing the SNUPPS Spare Parts Data Report (completed by Yarway) and the Yarway valve drawings, it appears that the personnel were unable to determine that the stem/disc assembly had an attachment weld which would require an ASME Code Data Report. Therefore, the procedures were correctly followed in that a review was performed. The ASME Code Data Report was not requested because the information available at the time of this purchase in 1984 did not clearly indicate that there was an attachment weld. It should be noted that Yarway changed the SNUPPS Spare Parts Data Report in 1985 to include identification of the stem/disk weld. Had this information been available in 1984 at the time the PR was processed it appears likely the personnel would have requested the Code Data Report.

A portion of the purchase requirements was identified by using a purchase order attachment which specified required documentation by utilizing a checklist format. Although the completed checklist for the stem assemblies correctly requested other required ASME Code documentation, the space for the ASME Code Data Report was checked "N/A". The use of the "N/A" in this checklist apparently resulted in the vendor assuming that code stamped assemblies were not being requested. Therefore, it is concluded that the reason for the failure to obtain the required Code Data Report was inadequate information available to WCNOG personnel and the use of the checklist for specifying required documentation. Without the checklist format and the resulting specific "NA" for the Data Report, Yarway would likely have supplied Code Stamped assemblies with the required Data Reports as required by the ASME Section III Code referenced by the specification invoked by the purchase order.

- C. WCNOG procedure QAP 4.1 "Processing of Procurement and Related Documents", Revision 0, paragraph 7.1.3, states the Quality Engineer "shall review the PR or MRV for inclusion of the following as applicable...". One of these requirements which was to be included if applicable discusses invoking the specification along with the revision number.

In regard to referencing the applicable E-specification revision on procurement documents to Westinghouse, WCNOG personnel considered this not to be applicable since Westinghouse was the AE of the original system and had the appropriate design information for WCNOG at their facility. Therefore, the procurement procedure did not specifically require that E-Specification revision numbers be specified for Westinghouse procurements.

#### Corrective Steps Taken and Results Achieved

- A. Applicable WCNOG procedures were reviewed for weaknesses relative to the proper classification of pressure boundary parts. Procedure KP-2140 was revised to further clarify the procurement requirements in regard to requesting documentation when procuring from Westinghouse. In addition, ADM 01-036 has been revised to require field personnel to obtain and review vendor supplied ASME code documentation prior to installing ASME Section III pressure boundary items.

WCNOG Supplier Quality performed a surveillance of Westinghouse NSID to investigate the cause and corrective action taken on the misclassification of the packing box assembly. Report of Noncompliance 03/88-01 was issued to Westinghouse as a result of the Westinghouse failure to follow procedures. Also Westinghouse System Audit QA group performed an internal audit of the Westinghouse RC Engineering group, which is responsible for classifying parts. The audit was a five day,

full time audit aimed at verifying compliance with OPR 405-5 and other Appendix B criteria. Neither the Westinghouse audit or the WCNOC surveillance revealed a problem in the area of parts classification; therefore, it is concluded that this was an isolated instance within the Westinghouse system.

The nonconforming condition of the installed packing box assembly has been documented and dispositioned on Corrective Work Request (CWR) 1285-88 and a relief request submitted to the NRC on 3/22/88 in WCNOC letter ET 88-0043. This relief was subsequently granted by the NRC in a letter dated 5/2/88.

The spare packing box assembly also ordered on WCNOC P.O. 521144 was identified as nonconforming on NCR M-1117 and dispositioned as "reject". (This spare was destructively tested as part of the resolution for the installed packing box assembly).

- B. The use of the checklist which communicated erroneous information to the vendor was discontinued on 8/9/85 when Revision 3 to ADM 01-048 was issued. The SNUPPS Spare Parts Data Report was updated in 1985 to indicate the existence of the weld. Since that time procurements for ASME Section III items from the original component vendor have invoked the original Bechtel specification, and in more recent procurements have also stated the Edition and Addenda of Section III in the purchase order. Code documentation is requested, but a checklist is not used. Even if a specified document such as a Code Data Report is not requested, the vendor would submit the Code Data Report if required for his particular fabrication technique to be in compliance with the ASME Section III requirements. Therefore, corrective actions were completed in 1985.

The nonconforming condition of the installed stem/disc assembly has been documented on CWR 1261-88 and a relief request submitted to the NRC in WCNOC letter ET 88-0043. The additional stem/disc assemblies also ordered on PO 51534 were identified as nonconforming and documented on NCR M-1116.

- C. Procedure KP-2140 "Material and Services Procurement" has been revised to provide additional instructions for Westinghouse procurements. Revision 2 of KP-2140 now requires the revision be referenced when a specification or drawing is invoked in a PR for procurement from Westinghouse, similar to previous requirements for non-Westinghouse procurements.

Corrective Steps Taken to Avoid Further Violations

- A. Procedure QAP 4.1 is being revised to clarify requirements relative to procurement from Westinghouse and to correct potentially conflicting instructions identified by the NRC inspector.
- B. In order to assure there are not other similar items in warehouse storage without required ASME Code Data Reports, other P.O.'s for ASME Section III replacement items in which the checklist was utilized will be identified. A sample check of these orders will be performed to determine if similar problems exist. Also a review of all Yarway supplied ASME replacement parts presently in stock will be performed to assure Yarway furnished the required code documentation.
- C. Procedure QAP 4.1 is being revised to provide clarification similar to KP-2140 revisions. Specifying the correct revisions in WCNOG procurement documents will assure Westinghouse provides replacement items appropriate for Wolf Creek Generating Station.

Date When Full Compliance will be Achieved

- A. Full compliance will be achieved by September 1, 1988.
- B. Full compliance will be achieved by September 1, 1988.
- C. Full compliance will be achieved by September 1, 1988.