

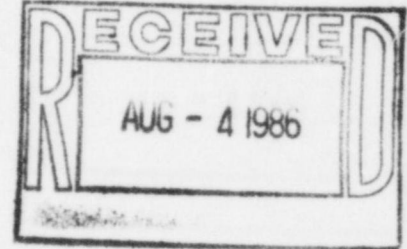


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

July 31, 1986

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



KMLNRC 86-137
Re: Docket No. STN 50-482
Subj: Response to Inspection Report STN 50-482/86-08

Dear Mr. Johnson:

This letter is written in reponse to your letter of July 2, 1986, which transmitted Inspection Report STN 50-482/86-08. As requested, the violations (482/8608-01, 02, 03) identified in the Inspection Report are 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 (482/8608-01): Failure To Verify Correct Revision of a Surveillance Procedure Prior To Use

Finding:

Wolf Creek Generating Station (WCGS) TS 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Section 8.b. of Appendix A to Regulatory Guide 1.33 specifies that specific procedures for surveillance tests, inspections, and calibrations are to be provided.

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Plant Administrative Procedure (ADM) 02-300, Revision 6, "Surveillance Testing," has been established and implemented in accordance with these requirements.

Step 5.4.1.6 states, "Verifying prior to its use that a procedure is the current revision He will document this review on the surveillance test routing sheet (STRS)"

Contrary to the above, on April 8, 1986, operations personnel performed and the shift supervisor signed off as complete, STS RE-004, "Shutdown Margin Determination," without first verifying and documenting that the procedure being used was the correct revision and/or that temporary changes were current.

Reason For Violation If Admitted:

The individual who initiated surveillance procedure STS RE-004, "Shutdown Margin Determination" failed to follow the administrative requirements of ADM 02-300, Revision 6, "Surveillance Testing."

Corrective Steps Which Have Been Taken and Results Achieved:

Upon notification of the failure to verify and document that the procedure being used was the correct revision and that any temporary changes were current, the Shift Supervisor performed the required verification and documentation. The procedure was verified to be the current revision and no other discrepancies were noted.

The failure to follow this procedure was discussed with the responsible individuals, stressing the importance of following procedures and verification of current revisions and temporary changes.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

A copy of the violation and this response will be placed in Operations Required Reading program to ensure operations personnel are cognizant of the procedural requirements and importance of verifying a surveillance procedure to be the current revision and that any temporary changes are current.

The Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by August 15, 1986.

Violation (482/8608-02): Failure To Maintain Auxiliary Building
Buttress Penetrations In Accordance With
Fire Hazards Analysis

Finding:

WCGS TS 3.7.11 requires, in part, that, "All fire barrier penetrations . . . separating safety-related fire areas . . . shall be operable."

Contrary to the above, on April 7, 1986, it was determined that the floor penetration covers on either side of 'C' containment tendon buttress on Elevations 2047' and 2026' were not 3-hour fire barriers and were outside the design basis as specified by the fire hazards analysis.

Reason For Violation If Admitted:

The covers of the openings were installed in accordance with the original design which was inadequate to maintain the three-hour fire rating. Kansas Gas & Electric Company (KG&E) was notified of the necessity of adding fireproofing to the existing covers by the Architect/Engineer in June of 1985. Shortly after this notification, a Plant Modification Request was initiated to add the required fireproofing, but during the initial review of this information, the Fire Hazards Analysis impact and Technical Specification applicability of this situation were not recognized. Consequently, the Plant Modification Request was assigned a relatively low priority, and had not yet been implemented.

This occurrence was the result of a deficiency in the original design, and the failure to install the required fireproofing is attributed to a personnel error. A contributing factor may have been that the personnel who reviewed the information were not completely familiar with all Technical Specification requirements in June of 1985.

Corrective Steps Which Have Been Taken and Results Achieved:

Upon discovery of the unsatisfactory condition, hourly fire watch patrols were established and have been maintained in accordance with Technical Specifications.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The Plant Modification Request (PMR) for installation of the missing fireproofing has been processed for implementation and the material is on order. Estimated date of material receipt is August 29, 1986. Upon receipt of the required fireproofing material, the PMR will be implemented and will require one to two weeks to complete.

Since June of 1985, the PMR process has been substantially revised, including a provision for appropriate supervisory personnel to assist in the determination of Technical Specification applicability of proposed design changes. In addition, personnel have gained familiarity with Technical Specification and Final Safety Analysis Report requirements.

The Date When Full Compliance Will Be Achieved:

Technical Specification compliance has been achieved in that fire impairments identify the requirement for an hourly fire watch in the affected areas. These fire watches have been implemented. Full compliance to the design specifications will be completed by November 15, 1986 based on a material receipt date of August 29, 1986.

Violation (482/8006-03): Failure To Adequately Perform TS Surveillance Requirement

Finding:

WCGS TS 4.0.5 requires, in part, that, "Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Code . . . except where specific written relief has been granted"

ASME Section XI, Division 1, 1980 Edition, Subsection IWV, states, in part, "If a valve . . . exceeds its specified limiting value of full-stroke time by this testing, then corrective action shall be initiated immediately. If the condition is not, or cannot be, corrected within 24 hours, the valve shall be declared inoperative."

Contrary to the above, on March 5, 1986, the open limit switches to valves AL HV-032 and AL HV-033 (essential service water to turbine driven auxiliary feedwater pump) were adjusted in the closed direction in order to meet the stroke time requirement of 15 seconds, however, this action reduced the stroke travel of the valve so that it no longer fulfilled the full-stroke provisions of ASME Section XI. Thus, the valve did not meet its full-stroke time.

Reason For Violation If Admitted:

Following failure of the valves to meet their required fifteen (15) second stroke time, a work request was written to investigate and correct the problem. The personnel performing the maintenance activity incorrectly shortened the stroke of the valves following technical manual and schematic instructions.

Corrective Steps Which Have Been Taken and Results Achieved:

Following an engineering evaluation of the occurrence, the valves were readjusted to full open, less a slight amount for valve coast. The engineering evaluation verified that at no time was flow decreased below that required to meet the safety analysis. The valves stroke time was reevaluated and increased as the previously established stroke time of fifteen (15) seconds was very conservative.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

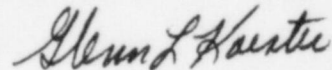
A review has been performed for all other valves with stroke times in the Section XI valve program to identify any that may have had their stroke limits adjusted. No further instances of limit switch adjustment to satisfy valve stroke times were identified. In addition, personnel performing maintenance activities in the Section XI valve program will be advised that stroke lengths cannot be shortened in order to satisfy valve stroke times without a proper evaluation.

The Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by September 1, 1986.

If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,



Glenn L. Koester
Vice President - Nuclear

GLK:see

cc: PO'Connor (2)
JCummins
JTaylor