8/12

KANSAS GAS AND ELECTRIC COMPANY

August 7, 1986

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

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 86-141
Re: Docket No. STN 50-482
Subj: Response to Inspection Report 50-482/86-14

Dear Mr. Johnson:

This letter is written in response to your letter of July 8, 1986, which transmitted Notice of Deviation 482/8614-04. As requested, the deviation identified in the Notice of Deviation is being addressed in four parts.

(a) The reason for deviation, if admitted;

(b) The corrective steps which have been taken and the results achieved;

(c) Corrective steps which will be taken to avoid further deviations; and

(d) The date when full compliance will be achieved.

The Vulkene Supreme wiring and Kulka terminal blocks are addressed separately due to the nature of the responses.

Deviation (482/8614-04): The Vulkene Supreme wiring and Kulka terminal blocks had no qualification summary and EEW showing qualifications of the wiring.

Finding

The "Environmental Descriptions of Safety Related Electrical Equipment," submitted by letter dated January 17, 1986, states that qualification summaries and Environmental Evaluation Worksheets (EEW) are required to describe equipment and to summarize the details of qualifications to the requirements of NUREG-0588.

In deviation from the above Vulkene Supreme wiring and Kulka terminal blocks, identified in Limitorque operators, had no qualification summaries and EEW's showing qualification of the wiring and the terminal blocks for use in a harsh environment.

IC-183/86

Vulkene Supreme Cable

Reason For Deviation If Admitted:

The qualification summaries and EEWs for the valve specifications which include Limitorque operators should have included data on Vulkene Supreme wire; however, these did not. The 1984 field walkdown sheets state that Vulkene Supreme wire is qualified to inside containment conditions by the qualification documentation for specification E-018. Review of the qualification summary/EEW and other qualification data for Vulkene Supreme wire contained in the E-018 documentation, plus a review of the environments for the Limitorque operators indicate that the wire is qualified for use in Limitorque operators at WCGS. It should be emphasized that this deviation involves only the lack of an adequate trail between the qualification data for the Limitorque operators and the qualification data for Vulkene Supreme wire and not the use of unqualified wire.

Corrective Steps Which Have Been Taken and Results Achieved:

An audit has been held at General Electric of Report "710-QUAL-30B" which verified that the Product Data Sheet used to develop the qualification summary and EEW for Vulkene Supreme wire was factual. A new checklist, EEW and qualifications summary for Vulkene Supreme wire, which will incorporate additional information obtained during the audit, are currently being developed and will be included in (or referenced from) the qualification packages for the Limitorque operators.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The deviation was an isolated case occurring during the construction phase of WCGS. Procedures currently in place for the operational phase require a review of design modifications for environmental qualification concerns and, if necessary, an update of the qualification documents.

The Date When Full Compliance Will be Achieved:

The EEW and Qualification summaries for Vulkene Supreme wire will be updated by 9/1/86.

Kulka Terminal Blocks

Reason For Deviation if Admitted:

A review of the 1984 walkdown data revealed that 17 Limitorque operators had Kulka terminal blocks (or unidentified blocks which were later determined

to be Kulka). These unqualified Kulka blocks were replaced in January 1985, prior to receipt of the operating license, with qualified Marathon 300 blocks. Due to limited time available during the audit, this information was not apparent and was not made available to the NRC inspector. Prior to May, 1986 the available information indicated that no Kulka blocks remained in Limitorque operators, therefore it was not necessary to reference the qualification report for Kulka blocks (i.e. Specification E-035).

Corrective Steps Which Have Been Taken and Results Achieved:

Kulka terminal blocks are not currently used in the Limitorque operators at Wolf Creek. Therefore, the Limitorque qualification documentation does not need to be revised to include the Kulka qualification information. As stated above, the Kulka terminal blocks identified in the 1984 Walkdown packages were replaced in January 1985 with qualified Marathon 300 blocks. The 1984 Walkdown packages will be revised to reflect that fact the Kulka blocks were replaced with Marathon 300 blocks.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

The 1984 Limitorque walkdowns did not include all qualified Limitorque operators in harsh environments. Therefore, KG&E conducted additional walkdowns in May 1986 to inspect the Limitorque operators which were not included in the 1984 walkdowns. All identified discrepancies have now been corrected.

The Date When Full Compliance Will Be Achieved:

Update of the 1984 walkdown packages will be completed by 9/30/86. All other actions discussed above have been completed.

Yours very truly,

John A Bailey

for Glenn L. Koester
Vice President - Nuclear

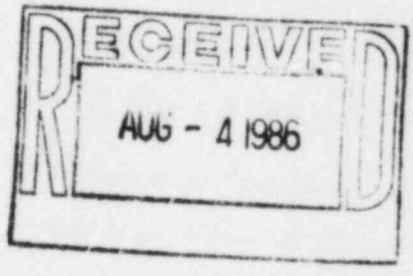
GLK:see

cc: PO'Connor (2)
JCummins
JTaylor

KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER
VICE PRESIDENT - NUCLEAR

August 1, 1986



Mr. R. D. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

KMLNRC 86-140
Re: Docket No. STN-50/482
Subj: Limitorque Wiring
Ref: Letter from JEGagliardo, NRC, to GLKoester, KG&E, dated 7/8/86 (Inspection Report 86-14)

Dear Mr. Martin:

The purpose of this letter is to provide additional information to supplement the information provided to Mr. D. E. Norman during his inspection conducted May 12-16, 1986 at Wolf Creek Generating Station (WCGS). Due to limited time available during this inspection some of the requested information was not available to be provided to Mr. Norman while he was at WCGS. Other information became available shortly after the conclusion of Mr. Norman's inspection.

The following paragraphs provide information for each of the potential violations discussed in Inspection Report 50-482/86-14.

86/14-01

The field verification forms showed that there were unidentifiable wires in the operator for KA-HV-0030. Although documentation is not available to show that the wires were either replaced or identified, subsequent inspections of the wires in the KA-HV-0030 operator performed in June, 1986 have determined that all the wires were environmentally qualified.

In addition, no field work has been performed on the wires in this operator since the issuance of the WCGS operating license on March 11, 1985. Therefore, either the wiring in the operator for KA-HV-0030 was replaced as a result of the late 1984 field verification walkdown or the wiring was environmentally qualified even though it was unidentifiable. In either case, however, the wiring in the KA-HV-0030 operator was and is environmentally qualified in accordance with the requirements of 10 CFR 50.49.

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86/14-02

As a part of the investigation of this potential violation, an additional review of all the field verification forms revealed terminal block identification problems in three areas. The problems and corrective actions are as follows:

1. The Field Verification Form for KC-HV-0253 had conflicting data on whether a terminal block was Marathon or Kulka. As a result of the original field verification followup action, this terminal block was replaced with a qualified Marathon block in January, 1985 (prior to issuance of the WCGS operating license). The existance of a qualified Marathon terminal block in this operator was reconfirmed in July, 1986.

2. The Field Verification Form for GS-HV-0020 lacked information on terminal block type. This terminal block was also replaced with qualified Marathon blocks in January, 1985.

3. The Field Verification Forms for all the operators in Specification M236 showed unidentified terminal blocks. However, it was determined that five (5) operators contained Marathon terminal blocks which are qualified while nine (9) operators contained unqualified Kulka terminal blocks. The Kulka terminal blocks were replaced with qualified Marathon terminal blocks in January, 1985.

   It should be noted that all Specification M-236 operators are category C, i.e., they may fail in any mode during an accident without jeopardizing plant safety. The decision to replace the Kulka blocks in M-236 was very conservative, but not required by 10 CFR 50.49.

In summary, all terminal blocks shown as unidentified on the walkdown sheets have either been identified as qualified or replaced with qualified blocks as a result of followup action taken after the original field verification walkdown in January, 1985 which was prior to the issuance of the WCGS operating license.

86/14-05

KG&E conducted an audit at General Electric Company, the manufacturer of Vukene Supreme wiring, on July 25, 1986. The audit showed that the information contained in the referenced Product Data Pamphlet was and continues to be an accurate representation of the GE test report which establishes environmental qualification for the wiring installed at Wolf Creek Generating Station.

Although a copy of the GE Vulkene Supreme test report was not included in the Equipment Qualification Work Packages, the GE Vulkene Supreme wiring is qualified to the requirements of 10 CFR 50.49 and the results of the audit will be included in the Equipment Qualification Work Packages to properly document the qualification.

86/14-06

Techbestos wire in operators for valves EJ-HV-8809A and EJ-HV-8809B was discovered and replaced by qualified wire in May, 1986.

86/14-07

A review of documentation was conducted soon after Mr. Norman's inspection. The review showed that there are no Kulka series terminal blocks (qualified or unqualified) being utilized in harsh environment Limitorque operators. The Kulka terminal blocks identified in late 1984 to be in seventeen (17) Limitorque operators were replaced with qualified Marathon terminal blocks prior to receipt of operating license on March 11, 1985. Since there were no identified Kulka terminal blocks in any harsh environment Limitorque operator, there was no need to demonstrate qualification in the Equipment Qualification Work Packages on Limitorque. However, the documentation for replacing the unqualified Kulka terminal blocks in the seventeen (17) Limitorque operators identified in late 1984 was not available during Mr. Norman's inspection due to limited available time.

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

Glenn L. Koester
Vice President - Nuclear

GLK:see

cc: PO'Connor (2)
JCummins
JGagliardo