

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers  
President and  
Chief Executive Officer

March 30, 1989

WM 89-0091

U. S. Nuclear Regulatory Commission  
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Washington, D. C. 20555

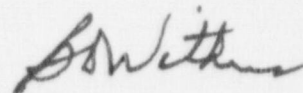
Subject: Docket No. 50-482: Response to NRC Bulletin 88-10,  
"Nonconforming Molded-Case Circuit Breakers"

Gentlemen:

The purpose of this letter is to transmit Wolf Creek Nuclear Operating Corporation's (WCNOC) response to NRC Bulletin 88-10, "Nonconforming Molded-Case Circuit Breakers". NRC Bulletin 88-10 requested licensees to take actions to provide reasonable assurance that molded-case circuit breakers purchased for use in safety-related applications without verifiable traceability to the circuit breaker manufacturer perform their safety function. A review of molded-case circuit breaker procurements was initiated in response to the bulletin and verifiable traceability was established for all molded-case circuit breakers being maintained as stored spares for possible use in safety-related applications. Because verifiable traceability was established, no further actions are required to be taken by WCNOC.

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  
E. J. Holler (NRC), w/a  
R. D. Martin (NRC), w/a  
D. V. Pickett (NRC), w/a

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Bart D. Withers, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By *B. Withers*  
Bart D. Withers  
President and Chief Executive Officer

SUBSCRIBED and sworn to before me this 30 day of March, 1989.

*Marlene Heathman*  
Notary Public

Expiration Date *August 4, 1990*



RESPONSE TO NRC BULLETIN 88-10

"Nonconforming Molded-Case Circuit Breakers"

I. Introduction

On November 22, 1988, the NRC issued Bulletin No. 88-10 entitled "Nonconforming Molded-Case Circuit Breakers". The bulletin requested licensees to take actions to provide reasonable assurance that molded-case circuit breakers (MCCBs) including MCCBs used with motor controllers, purchased for use in safety-related applications without verifiable traceability to the circuit breaker manufacturer (CBM) perform their safety functions. "Verifiable traceability" as defined in the bulletin, requires documented evidence such as a Certification of Compliance (C of C) that establishes traceability of purchased equipment to the MCCB manufacturer. If a C of C was provided by any party other than the MCCB manufacturer, the validity of such certificate must be verified by the licensee through audit or other appropriate means.

II. Response to Actions Requested

1. All addresses are requested to perform the following review by March 1, 1989:
  - a. Identify all MCCBs purchased prior to August 1, 1988, that are being maintained as stored spares for safety-related (Class IE) applications or commercial grade CBs that are being maintained as stored spares for future use in safety-related applications; this includes CBs purchased from a CBM or from any other source. If the number of these stored spare CBs is less than 50 at a nuclear plant site, then randomly select CBs purchased between August 1, 1983 and August 1, 1988 that have been installed in safety-related applications as replacements or modifications to form a minimum sample of 50 CBs per nuclear plant site.
  - b. Verify the traceability of these CBs.
  - c. Identify the number, manufacturer, model number, and to the extent possible the procurement chain for all those CBs identified in (1a) that cannot be traced to the circuit breaker manufacturer (CBM). For installed CBs, also identify each system in which they are/were installed.

A review was conducted at Wolf Creek Generating Station (WCGS) to identify the MCCBs requested by Item 1.a. This review identified 125 MCCBs that were procured as operational safety-related spares or that were on-hand as a result of the construction turnover.

After the MCCBs being kept as stored spares had been identified, a further review was conducted which verified the traceability of the breakers back to the circuit breaker manufacturer. As stated above, "verifiable traceability" required documented evidence such as a C of C that established traceability of purchased equipment to the MCCB manufacturer. In addition to establishing traceability, verification was performed to show that MCCBs provided as spares met all applicable plant design and original manufacturer's specifications. Both were accomplished by review of documentation submitted with the MCCBs and by contacting the supplier to trace the procurement chain and confirm MCCB certification and by satisfactory on-site audits and surveillances to confirm configuration. There were no cases in which MCCBs could not be traced to the manufacturer.

2., 3., 4., 5., 6.

Since all MCCBs were traceable to the manufacturer, these items are not applicable to WCGS.

7. With the exception of actions taken in response to items 3 and 5 of the actions requested above, molded-case CBs installed in safety-related applications after August 1, 1988 should be:

- a. Manufactured by and procured from a CBM under a 10 CFR 50, Appendix B, program; or
- b. Procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related by the licensee or others using an acceptable dedication program. The NRC encourages addresses to significantly upgrade their dedication programs through a joint industry effort to ensure their adequacy and consistency. The NRC will monitor these industry initiatives and if they are not sufficient or not timely, or if problems with the dedication of commercial grade equipment for safety-related use continue, the NRC will take appropriate regulatory actions.

The requirements to have MCCBs manufactured and procured from a MCCB manufacturer under a 10 CFR 50, Appendix B program or to have verifiable traceability to a CBM has been included in the procurement program at WCGS.

### III. Conclusion

In response to the actions requested in NRC Bulletin 88-10, a review of MCCBs at WCGS was conducted to verify traceability of the MCCBs back to the original manufacturer to provide assurance that the breakers met their design specifications. The bulletin noted that MCCBs purchased from the manufacturer or that can be traced to the manufacturer are of lesser concern than other MCCBs because they are manufactured under controlled conditions to conform to proven design. In addition, they are controlled under quality assurance programs that conform to 10 CFR, Appendix B criteria.

The review conducted at WCGS confirmed that all MCCBs on-hand to be used as safety-related spares met the criteria in item 7 above. Therefore, no further actions were required to prove the acceptability of the MCCBs in accordance with the bulletin.