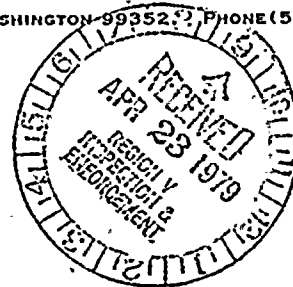


Washington Public Power Supply System
A JOINT OPERATING AGENCY

P. O. Box 968 3000 GEO. WASHINGTON WAY RICHLAND, WASHINGTON 99352-2 PHONE (509) 946-1611

April 20, 1979
G02-79-76



Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
Walnut Creek, California 94596

Attention: Mr. G. S. Spencer
Chief, Reactor Construction and
Engineering Support Branch

Subject: WPPSS NUCLEAR PROJECT NO. 2
NRC INSPECTION - FEBRUARY 1, 2, 14 and 15, 1979
DOCKET NUMBER 50-397

- References:
- 1) Letter, G. S. Spencer to N. O. Strand,
dated March 21, 1979
 - 2) Letter, D. F. Knuth to all AEC Licensees
dated December 31, 1974, "Criteria for
Determining Enforcement Action and Categories
of Non-Compliance"

Dear Mr. Spencer:

This is in response to your letter of March 21, 1979, Reference 1), which documented the results of the NRC Inspection conducted on February 1, 2, 14, and 15, 1979, of activities authorized by NRC Construction Permit No. CPPR 93. This letter identified two items of noncompliance which were categorized as infractions in accordance with the provisions of Reference 2) and required that WPPSS provide a response to these items.

The specific NRC "Notice of Violation", as stated in your letter, and the WPPSS responses are provided in Appendix A to this letter.

If you have any questions or desire further information, please advise.

Very truly yours,

D. L. Renberger
D. L. RENBERGER
Assistant Director
Technology

DLR:HRT:jdb

cc: JG Davis - Office of Inspection & Enforcement
C. Bryant - BPA

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APPENDIX A

Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Construction Permit No. CPPR-93

Notice of Violation

Based on the results of NRC investigations conducted between February 1 and 15, 1979, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Facility License No. CPPR-93 (Unit 2) as indicated below. These items are infractions.

- A. 10 CFR Part 50, Appendix B, Criterion XVIII, states, in part, that "...audits shall be carried out to verify compliance with all aspects of the quality assurance program..." and "...Followup action, including reaudit of deficient areas, shall be taken where indicated."

Paragraph D.2.7 of the Quality Assurance Program, as documented in the PSAR, states, in part, that, "All manufacturing processes, testing, and inspection operations performed by...site construction contractors and their subcontractors shall be subject to quality...audit...." Paragraph D.3.4.18, which follows, states, in part, that, "...Responsible management personnel will take the necessary action to correct the deficiencies revealed by the audit..."

Contrary to the above, the licensee audit on August 4, 1978, of The Waldinger Corporation, a site construction contractor, disclosed that the contractor had not performed audits of its subcontractor. As of January 31, 1979, the contractor still had not audited the subcontractor.

ACTION TO CORRECT DEFICIENCY

1) WPPSS/B&R identified that Waldinger (TWC) had not performed the audit and issued a finding August 1978; 2) TWC responded that they would audit their subcontractor; 3) WPPSS/B&R in verifying if corrective action was implemented found that TWC had not audited their subcontractor (October 1978); 4) WPPSS/B&R gave TWC an extension of corrective action to January 1979; 5) The second audit follow-up (January 1979) revealed that TWC still had not implemented corrective action; 6) WPPSS/B&R immediately issued a letter to TWC directing them to conduct the audit within five (5) working days; 7) The audit was conducted by TWC on their subcontractor February 1979.

Failure of TWC to audit their subcontractor was properly documented, followed up, extensions given and a letter of direction given to complete the audit.

Appendix A (cont'd)

ACTION TO PREVENT RECURRENCE

The WPPSS/B&R audit procedure is being revised to provide for a management briefing when necessary to notify WPPSS/B&R management of significant deficiencies or failure of contractors to take action in a timely manner. These management briefings and the actions taken will be documented.

DATE OF FULL COMPLIANCE

Full compliance will be achieved by May 15, 1979.

- B. 10 CFR Part 50, Appendix B, Criterion X, states, in part, that, "A program for inspection of activities affecting quality shall be established and executed...to verify conformance with...instructions, procedures, and drawings..."

Paragraph D.2.5.10 of Quality Assurance Program, as documented in the PSAR, states, in part, that, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance to...instructions, procedures, and drawings..."

Contrary to the above, as of February 2, 1979, inspections of safety related pipe supports by the Industrial Heating and Supply Company, a subcontractor to The Waldinger Corporation, did not verify conformance of pipe support RD-405 with its installation drawing. The support was installed 90° out of the specified orientation, but had been accepted by the subcontractor's inspector on January 17, 1979.

ACTION TO CORRECT DEFICIENCY

The deficient hanger, RD-405, has been documented on a Nonconformance Report (NCR #04068) and the disposition is to remove the lug and replace it properly.

ACTION TO PREVENT RECURRENCE

- 1) IHP is retraining their inspectors on the requirements of their inspection program.
- 2) All IHP Quality Class I hangers installed prior to the NRC inspection will be 100% reinspected by IHP.
- 3) Waldinger Quality Assurance and WPPSS/B&R Quality Assurance will conduct frequent surveillances of IHP's inspection program until a confidence level is established.

DATE OF FULL COMPLIANCE

Full compliance will be achieved by June 1, 1979.

11-11-11

