



Washington Public Power Supply System  
A JOINT OPERATING AGENCY

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May 10, 1979  
G02-79-92

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

Attention: R. H. Engelken, Director

Subject: WPPSS NUCLEAR PROJECT NO. 2  
NRC INSPECTION - FEBRUARY 27-28, MARCH 1-2,  
AND MARCH 14-16, 1979  
DOCKET NUMBER 50-397

- References:
- 1) Letter, R. H. Engelken to N. O. Strand,  
dated April 17, 1979
  - 2) Letter, D. F. Knuth to all AEC Licensees,  
dated December 31, 1974, "Criteria for  
Determining Enforcement Action and Categori-  
es of Non-Compliance".

Dear Mr. Engelken:

This is in response to your letter of April 17, 1979, (Reference 1), which documented the results of the NRC inspection conducted on February 27-28, March 1-2 and 14-16, 1979 of activities authorized by NRC Construction Permit No. CPPR 93. This letter identified six items of noncompliance which were categorized as infractions and deficiencies 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  
Assistant Director  
Generation and Technology

DLR/AMS/1n

cc w/att: JG Davis - Office of Inspection & Enforcement, Washington, D.C.  
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 inspections conducted between February 27 and March 16, 1979, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Facility License No. CPPR-93 as indicated below.

- A. 10CFR50, Appendix B, Criterion V, states in part, that "Activities affecting quality...shall be accomplished in accordance with these instructions, procedures or drawings..."

Paragraph D.2.5 of the WPPSS Quality Assurance Program documented in the PSAR states, in part, that "...all project contractors for the nuclear related portions of the plant will be required to have a Quality Assurance Program...The program shall include the following items as...applicable to the...construction for which the contractor is responsible". Paragraph D.2.5.5, which follows, states in part, that "Activity affecting quality...shall be accomplished in accordance with...procedures..."

1. Work Procedure SP-2005-H2, Rev. 2, of the Johnson Controls Inc., a site contractor, states in part, that, "All pipe and tube endings will be capped or otherwise closed at the end of each day."

Contrary to the above, on February 27 and March 1, 1979, the process instrument pipe no. 220-3.0-X-44e, and nine other ports off the reactor vessel nozzle no. N-9A were found to be open, exposing the internals of the reactor vessel.

This is an infraction.

Corrective Action: All ports were taped immediately. Nonconformance Report Number 220-02654 was initiated against nozzle N-9A. The disposition of the NCR was to clean, inspect and recap. The work was completed and NCR closed.

Action To Prevent Recurrence: Procedure No. QAS-1402-H2 was revised to include daily inspections of such items when placed in Johnson Controls (2808-220) custody.

Date of Full Compliance: May 15, 1979



2. Exide Company installation instructions for battery racks, entitled "Instructions for Assembling Seismic Restraint Racks for Exide Batteries", requires battery cells to be provided with a snug fit in the racks using plastic spacers in order to meet seismic loading requirements.

Contrary to the above, on February 28, 1979, the plastic spacers installed between cells of batteries B1-1, B1-2, and B2-1 did not fit snugly between the cells, allowing the cells to move both laterally and vertically. Additionally, no shims were installed between the rack uprights and rails for batteries B1-1, B1-2, and B2-1 resulting in about 25 cells of B1-1 and about 10 cells of B1-2 having a gap between cell and rail of about 1/8" to 1/4". These installations were performed and accepted by the Fischbach/Lord Company, a site contractor.

This is an infraction.

Action to Correct Deficiency: Nonconformance Report Nos. 04285 and 05589 have been written to document the deficiency.

Action To Prevent Recurrence: Fischbach/Lord crafts and inspection personnel will be reinstructed to ensure that installation conforms not only to applicable drawings and specifications, but also manufacturer's installation instructions referenced in the Installation Procedure Checklist (IPC).

Date of Full Compliance: June 15, 1979

- C. 10CFR50, 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 documented instructions, procedures, and drawings..."

Paragraph D.2.5.10 of the 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...to verify conformance to documented instructions, procedures, and drawings..."

Contrary to the above, prior to March 1, 1979, the Johnson Controls Inc., a site contractor, did not perform inspections of pipe material preheat temperature prior to welding as established by the weld data sheets for work packages of the 220-3-X-44B series.

This is an infraction.

Corrective Action: A Corrective Action Request No. 2 has been issued by Johnson Controls, to document the fact that inspectors were not measuring preheat temperature on the pipe. The pipe in question was stored in the shop and subsequently welded in the shop. The ambient temperature in the shop remains at a constant 70°. The pipe temperature would be greater than the required 60° F, therefore, the welds in question require no additional action.



Action To Prevent Recurrence: Contact Pyrometers, traceable to National Standards, were purchased; the inspectors were trained in their usage; and the instruments were placed in service.

Date of Full Compliance: Current.

- C. 10CFR50, Appendix B, Criterion XIV, states in part, that, "Measures shall be established to indicate, by the use of markings such as stamps, tags, labels, routing cards, or other suitable means the status of inspections...performed upon individual items of the nuclear power plant..."

Paragraph D.2.5.14 of the Quality Assurance Program as documented in the PSAR, states in part that, "Measures shall be established and documented by the contractor to identify inspection...status. Such measures shall provide means for assuring that required inspections...are performed and that the acceptability of items with regard to inspections...performed is known throughout manufacturing, installation, and operation..."

Contrary to the above, as of February 28, 1979, Johnson Controls, Inc., a site contractor, performed inspections of instrumentation piping welds shown on drawings 220-3.0-X-44Bc, and -44Bf, and -44Bk without documenting the acceptability of the inspections. In addition, instrumentation piping welds shown on drawings 220-3.0-X-44Ba, -44Bb, -44Bd, and -44Be were completed on February 27, 1979, without documenting inspection results until the following day.

This is an infraction.

Corrective Action: The concerned welds were inspected in a timely manner but the documents were not signed off until the next day. The affected documents were reviewed with the inspectors and found to be accurate.

Action To Prevent Recurrence: A training session was held and all Johnson Controls inspectors were instructed to sign off documents immediately upon inspection. Close surveillance of these areas are being conducted by Johnson Controls QA Supervision and Project QA.

Date of Full Compliance: Current

- D. 10CFR50, Appendix B, Criterion VIII, states in part, that "Measures shall be established for the identification and control of materials, parts, and components..." and "These identification and control measures shall be designed to prevent the use of incorrect...components".

Paragraph D.2.8.8 of the Quality Assurance Program, as documented in the PSAR, states in part, that "A system of tags and stamps will be employed to provide identification as to the quality status of materials, parts, and components..."





Contract specification no. 2808-48 (regarding purchase of 480 volt Class I and Class II switchgear) requires, in Paragraph 3.4.2, that breakers be positively identified as to Quality Class I or Class II.

Contrary to the above, as of March 1, 1979, 480 volt breakers installed in Quality Class I switchgear (Nos. SL-71, SL-73, SL-81, and SL-83) were not identified as to quality class.

This is a deficiency.

Action to Correct Deficiency: NCR 48-05586 was written to document this deficiency. The NCR disposition will be for WNP-2 Engineering to issue a PED to Contract 218 (Fischbach/Lord) to identify Quality Class I breakers by appropriate tags.

Action To Prevent Recurrence: All low voltage switchgear breakers have been delivered and installed at WNP-2 and are covered by the NCR No. 48-05586.

Date of Full Compliance: Full compliance will be achieved by June 8, 1979.

- E. 10CFR50, Appendix B, Criterion V, states in part, that, "Activities affecting quality...shall be accomplished in accordance with these instructions, procedures or drawings..."

Paragraph D.2.5 of the Quality Assurance Program documented in the PSAR states in part, that "...all project contractors for the nuclear related portions of the plant will be required to have a Quality Assurance Program...The program shall include the following items as...applicable to the...construction for which the contractor is responsible." Paragraph D.2.5.5, which follows, states in part, that "Activities affecting quality...shall be accomplished in accordance with...drawings..."

The PSAR, Paragraph 8.8.4.2 states that, "...each cable assigned a segregation code has a colored tag...identifying the segregation code." Fischbach/Lord Procedure No. QAP 404.1 (Inspection of Insulated Cable Installation), specifies that the cable tag background color be red for division 3 cables and orange for division 2 cables.

Contrary to the above, as of February 27, 1979, the color coded tags for Division 3 cables 3HPCS-0391-C-DIV3, 3HPCS-0091-C-DIV3, 3HPCS-0257-C-DIV3, 3HPCS-0258-C-DIV3, and 3HPCS-0259-C-DIV3 installed by Fischbach/Lord Company, a site contractor, were orange in color.

This is a deficiency.

Action to Correct Deficiency: Inspection Report (IR No. 8244) was written documenting the incorrect color of tags. The tags have been corrected and the IR has been closed.



Action to Prevent Recurrence:

1. Fischbach/Lord (F/L) Quality Assurance issued a Stop Work Order No. 16 against continued work. All Class I tags issued to the field were checked to assure compliance to contract specifications. A total of 26 tags found in error were corrected out of 1200 checked. The Stop Work Order was subsequently lifted.
2. F/L Engineering has instituted an additional edit/proofread of all tags issued for installation in accordance with memo FRT-79-006.
3. F/L Instruction Directive No. 420 is being updated to reflect detailed tag identification requirements.
4. Color charts are now in possession of Construction personnel and are checked by the craftsmen prior to installation. The Termination Group will now be informed directly by the craft of any erroneous tags prior to installation.

Date of Full Compliance: June 15, 1979

Note: It should be noted that during the course of the surveillance/ inspection and rework to correct this noncompliance, the problem has been found to consist of a color coding problem only. No cases of improperly identified circuits were found.

