

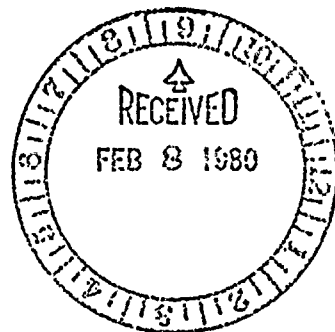
Washington Public Power Supply System
A JOINT OPERATING AGENCY

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G02-80-30
February 4, 1980

G. S. Spencer, Chief
Reactor Construction and Engineering Support Branch
Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1900 N. California Boulevard
Walnut Creek, California 94596

Subject: WPPSS NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397, CPPR-93
NRC INSPECTION - OCTOBER 22-25, 1979
REPORT NO. 50-397/79-16



Reference: Letter G. S. Spencer to N. O. Strand,
dated December 18, 1979

Dear Mr. Spencer:

This is in response to your letter of December 18, 1979 (referenced above), which documented the results of the NRC inspection conducted on October 22-25, 1979 of activities authorized by NRC Construction Permit No. CPPR-93. This letter identified three items of noncompliance which were categorized as infractions.

The specific NRC findings, 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/PJM/ln

Attachment: As stated

cc w/att: JM Blas - B&R, NY
HR Canter - B&R, NY
JR Lewis - BPA, Richland
V Stello - Office of Inspection & Enforcement, Washington, D.C.
JJ Verderber - B&R, NY

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APPENDIX A

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

Docket Number 50-397
Construction Permit Number CPPR-93

NOTICE OF VIOLATION

Based on the results of NRC inspections conducted between October 22 and 25, 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. 10CFR 50, Appendix B, Criterion V, states in part, that "activities affecting quality...shall be accomplished in accordance with...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 states in part, that, "activity affecting quality...shall be accomplished in accordance with...procedures..."

- (1) Work procedure SP-2005-H2, 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 October 24, 1979, at the end of the work day, one process instrument line on containment penetration no. 72, two process instrument lines on penetration no. 54B, and four process instrument lines on penetration no. 29 were found uncapped, exposing the internals of the reactor vessel. This is a repeat of previous NRC findings on February 27 and March 1, 1979.

This is an infraction.

ACTION TO CORRECT DEFICIENCY

Corrective Action Request No. 220-1425 was initiated against the deficient penetration. All deficient areas were inspected for cleanliness and recapped. The 220 contractor documented the inspection and rework on Inspection/Surveillance Report Number 477, dated 11/5/79.

Appendix A (continued)

ACTION TO PREVENT RECURRENCE

Daily surveillances were doubled by Johnson Controls in all areas in their custody. This activity began on October 29, 1979. Johnson Controls Project Manager issued a memo to all craft supervision regarding the importance of capping or sealing instrument lines and penetrations. This memo was issued and posted on the craft bulletin board November 15, 1979. Training sessions for craft and QA personnel were held between October 29 and December 12, 1979. Eleven classes were held.

DATE OF FULL COMPLIANCE

Full compliance was achieved December 15, 1979.

- (2) Fischbach/Lord Electric Company procedure CP208 states under general maintenance requirements: "covers, caps, plugs, and other closures shall be maintained intact." This procedure goes on to state "dust coverings, shrouds, local sealing, heating methods and mechanical cleaning shall be employed to keep the structure as clean and dry as possible."

Contrary to the above, inspection of instrument racks H22 P026, H22 P027, H22 P005, and H22 P004, on October 24, 1979, revealed:

- (a) A heavy accumulation of dust, dirt, and debris on all racks.
- (b) The racks were not protected from adjacent construction activities and were used to store structural bolts, structural steel plates, and a gas pressure bottle cap.
- (c) On rack H22 P026, instruments B22 N038A and B22 N036B had been removed without capping or otherwise protecting the opened tube ends leading to the instruments. Likewise, on rack H22 P005, instruments C34 N004C and B22 N026C had been removed without capping or otherwise protecting the opened tube ends leading to the instruments.
- (d) Dirt and debris was evident during a visual inspection of the inside of uncapped instrument sensing lines on the above mentioned racks.

This is an infraction.

ACTION TO CORRECT DEFICIENCY

All deficient equipment was cleaned and sealed or capped immediately.

Appendix A (continued)

ACTION TO PREVENT RECURRENCE

Surveillance activities have been increased to assure implementation of maintenance requirements and protection from construction activities. Corrective Action Request No. 218-1424, against the deficient maintenance and cleanliness activities, has been issued to the contractor. A revised maintenance procedure has been issued which clarifies maintenance requirements and establishes specific time intervals for maintenance performance. Audits/surveillances are being conducted to verify adequate corrective action.

In addition, for equipment under the cognizance of Test and Startup, the Instrument Test Guide will be revised to require performance of System Lineup Test I-3 when removing or installing any instruments in the plant. This will assure cleanliness and proper plugging/taping of instrument lines.

DATE OF FULL COMPLIANCE

Full compliance was achieved on January 31, 1980.

- B. 10CFR 50, Appendix B, Criterion III, requires in part, "measures shall be established to assure that applicable regulatory requirements...are correctly translated into specifications, drawings, procedures, and instructions."

FSAR table 3.2-1 lists reactor protective system components as Quality Class I ("meets the quality assurance requirements of 10CFR 50, Appendix B") and Seismic Category I. The PSAR paragraph 7.2.1.1.2 "classification", further states..."The Reactor protective system is classified as Safety Class 2, Seismic Category I, and Quality Group B (Electrical Safety Class IE)".

Contrary to the above requirements, on October 23, 1979, inspection of the reactor protection system (RPS) disclosed 4 turbine stop valve position switches (POS N006 A through D), and 8 pressure switches providing RPS indication of turbine governor valve fast closure (PS N005 A through D) were not specified and purchased to Electrical Safety Class IE and Seismic Category I requirements.

This is an infraction.

ACTION TO CORRECT DEFICIENCY

An Engineering change is being processed (Project Engineering Directive (PED) No. 218-E-2340) to replace the existing instrumentation with qualified instruments or type tested existing instruments.

Appendix A (continued)

In addition, the WNP-2 FSAR is being reviewed and will be revised to clarify the seismic classification, the quality group, and the quality class, as applicable, of the turbine generator inputs to the Reactor Protective System.

ACTION TO PREVENT RECURRENCE

WNP-2 has a program in progress to identify all Class IE equipment and verify that adequate documentation exists for each piece. The type of problem noted above will be identified during this program. Corrective action will be taken as appropriate.

DATE OF FULL COMPLIANCE

Full compliance will be achieved by June 27, 1980.

