



Washington Public Power Supply System  
A JOINT OPERATING AGENCY

P. O. Box 968

3000 GEO. WASHINGTON WAY

RICHLAND, WASHINGTON 99352

PHONE (509) 375-5000

Docket No. 50-397

November 26, 1980

G02-80-269

Nuclear Regulatory Commission  
1990 North California Boulevard  
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  
DOCKET NO. 50-397, CPPR-93  
NRC INSPECTION SEPTEMBER 1-30, 1980  
REPORT NO. 50-397/80-16

Reference: Letter G.S. Spencer to R.L. Ferguson, NRC Inspection  
at Washington Nuclear Project No. 2, dated  
November 4, 1980

Dear Mr. Spencer:

Washington Public Power Supply System hereby replies to the Notice of Violation transmitted as Appendix A, "Safety Related Electrical Switch Gear Manufactured by Westinghouse", to your letter dated November 4, 1980. The reply pursuant to the provisions of Section 2.201, of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, consists of this letter and Appendix A. The scope of the reply to the Notice of Violation includes the matters relating to that notice discussed both in your transmittal letter and in the text of Appendix A itself.

In Appendix A, we quote the item of noncompliance from Appendix A of your November 4, 1980 letter, address (1) the corrective steps which have been taken by us and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

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

Very truly yours,



R.G. MATLOCK  
WNP-2 Program Director

RGM/JPT/see

Attachment: Appendix A

cc: WNP-2 Files  
JM Blas - B&R, NY - w/1  
JR Lewis - BPA - w/1  
JJ Verderber - B&R, NY - w/1  
HR Cantor - B&R, NY - w/1  
AD Toth - NRC Resident Inspector WNP-2 - w/1  
→ V Stello - Office of Inspection & Enforcement, WDC - w/1

APPENDIX A

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

Docket No. 50-397  
Construction Permit No. CPPR-93

NOTICE OF VIOLATION

Based on the results of NRC inspections conducted during the period of September 1-30, 1980, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Construction Permit No. CPPR-93 as indicated below:

10 CFR 50.55(e) states, in part, that "the holder of a construction permit shall notify the Commission of each deficiency found in design and construction, which, were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant, and which represents...A significant deficiency in construction of or significant damage to a structure, system, or component which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function... The holder of a construction permit shall within 24 hours notify the appropriate Nuclear Regulatory Commission Inspection and Enforcement Regional Office of each reportable deficiency."

Contrary to the above, the licensee did not notify the Nuclear Regulatory Commission Inspection and Enforcement Regional Office that safety related electrical switch gear manufactured by Westinghouse had been installed such that it was unknown whether the equipment would operate properly during a design basis seismic event. Extensive evaluation and in-situ testing were required to determine the acceptability of the installation. The licensee was notified by the architect-engineer on July 5, 1979, of this construction deficiency and that an extensive evaluation program would be required to establish the acceptability of the installation.

This is an infraction..

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

All known construction deficiencies have been reviewed for reporting as potential 10 CFR 50.55(e) items and where appropriate have been reported as such. These reviews are being conducted by senior licensee representatives and as of this date there is no backlog of such items requiring evaluation.

2. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A Project Management Instruction (PMI) is currently being drafted and will be submitted for approval on or about 12-5-80. This PMI will formalize the policy now in effect for reporting 10 CFR 50.55(e) construction deficiencies at WNP-2. This policy is in conformance with the NRC Region V, IE Guidance-10 CFR 50.55(e), Construction Deficiency Reporting dated 4-1-80, however, the following clarifications of the WPPSS policy with regard to the aforementioned guidance, apply:

- A) Two senior level licensee representatives (1 primary alternate and 1 alternate) have been designated as being responsible for determining reportability under 10 CFR 50.55(e) of all NCR's etc. that lower tier contractors and/or lower level personnel consider to be potentially reportable. This determination is required to be made within 1 week of notification.
- B) Within 24 hours after the decision that a deficient condition is potentially reportable, NRC Region V will be notified by telecon of the potential condition.

It is to be noted that the switchgear for which this Notice of Violation was issued, has been found to be adequate as installed.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

WNP-2 will be in full compliance with the December 5, 1980 scheduled issuance of the PMI for identifying and reporting 10 CFR 50.55(e).