

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

G02-81-122
May 28, 1981



Nuclear Regulatory Commission
1990 North California Boulevard
Suite 202, Walnut Creek Plaza
Walnut Creek, California 94596

Attention: Mr. B. H. Faulkenberry, Chief
Reactor Construction Projects Branch

Subject: WPPSS NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397, CPPR-93
NRC INSPECTIONS February 10-13, 17-20,
23-27 and March 2-6 and 9-13, 1981
REPORT NO. 50-397/81-03

Reference: Letter B. H. Faulkenberry to R. G. Matlock, NRC
Inspection at Washington Nuclear Project No. 2,
Dated May 7, 1981

Dear Mr. Faulkenberry:

Washington Public Power Supply System hereby replies to the Notice of Violation transmitted as Appendix A, "Document Control Log and Planned Equipment Maintenance Deficiencies," to your letter dated May 7, 1981. 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 May 7, 1981 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/DLS/bjg

Attachment: Appendix A

cc: WS Chin, BPA - w/a
JJ Verderber, B&R, NY - w/a
HR Canter, B&R, Richland - w/a
AD Toth, NRC Resident Inspector WNP2 - w/a
V. Stello, Office of Inspection & Enforcement, WDC - w/a
TA Mangelsdorf, Bechtel (Site) - w/a

STATE OF WASHINGTON)

COUNTY OF BENTON)

SS

ROBERT G. MATLOCK, Being first duly sworn, deposes and says: That he is the WNP-2 Program Director of the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the permit holder herein; that he is authorized to submit the foregoing on behalf of said permit holder; that he has read the foregoing and attachments listed therein and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED: 5-28-81, 1981

R. G. Matlock
R. G. MATLOCK

On this day personally appeared before me R. G. Matlock to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 28th day of May, 1981.

John W. Weaver
Notary Public in and for the State of
Washington
Residing at Kennecook



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

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

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted on February 10-13, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Paragraphs D.2.5.5 of the QA Project Instruction No. WNP-2-018, "Drawing Control Log (DCL) and Specification Control Log (SCL)" states, in part: "... (C.1.a) The DCL displays the latest revision level of each Burns and Roe drawing and identifies all not yet incorporated Engineering Change Documents (ECDs (Section A.11 of WNP-2-018 identifies Project Engineering Directives (PEDs) as one of the types of ECDs used by B&R)).... (C.1.b.) A drawing must be revised when it either (a) has charged against it five (5) or more ECDs which have assigned business documents (or W series PEDs which are installed) or, (b) at least one (1) ECD which is outstanding greater than three months (Excluding W series PEDs)...."

Contrary to the above, as of February 13, 1981, Burns and Roe drawings M-601, M-611, M-630, M-805, and E-539-52 were not revised when the Drawing Control Log identified five (5) or more PEDs with assigned business documents, and/or at least one (1) PED outstanding greater than three (3) months, against each of the referenced drawings.

This is a Severity Level V violation (Supplement II).

- B. Wright-Schuchart-Harbor/Boecon Corp./General Energy Resources, Inc. (WBG) Contract Specification (No. 2808-215) specifies that installed equipment shall be maintained in accordance with ANSI N45.2.2-1972. This standard requires in section 6 (storage) that "space heaters enclosed in electrical items shall be energized (and) rotating electrical equipment shall be given insulation resistance tests on a scheduled basis."

The WBG Planned Maintenance Item Data Sheet, prepared in accordance with WBG permanent plant equipment/valve maintenance, rework, and repair program (Procedure No. WP-106) requires quarterly equipment inspections including insulation resistance tests.

Contrary to these requirements, it was noted on February 19, 1981, that the motor for standby service water pump 1A (Safety-related equipment) did not have energized space heaters. Additionally, a review of maintenance documentation disclosed that the motor had not had insulation resistance tests performed on it since August 7, 1979.

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

X



A.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

The deficient items as identified in the subject inspection report have been reviewed and scheduled for up-dating as required by WNP-2-018, Drawing Control Log (DCL) and Specification Control Log (SCL).

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

Periodic audits/surveillance of the Design Control Logs are to be performed by Burns and Roe Quality Engineering Organization, which will be established June 1, 1981.

The personnel responsible for up-dating drawings will be re-trained to applicable procedures prior to June 15, 1981.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

WNP-2 will be in full compliance of applicable requirements by July 30, 1981.

B.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

A Corrective Action Request (#1522) was issued March 3, 1981, by the Licensee, to Contract 215 for failure to perform required maintenance on Standby Service Water Pump 1A.

Temporary power to the item identified was installed on March 6, 1981 by Contract 215. Insulation resistance testing has been scheduled for the next quarterly equipment inspection by Contract 218.

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

WBG's WM-106, Preventative Maintenance System, paragraph 4.2.1H, was revised to note:

- h) Upon receipt of direction from the Owner turning back to Contract 215 a piece of equipment or large-bore valve already provisionally accepted, the Equipment Engineer shall:
 - o Issue to the craft a handwritten card to perform PMS tasks. The PMS tasks shall be defined per this work procedure (Work Procedure No. 106).
 - o Input the PMS requirements into the computer for scheduled PMS card retrieval.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

WP-106 was revised on April 30, 1981. Insulation resistance testing has been scheduled and will be performed prior to July 30, 1981.



SUMMARY OF COMMITMENTS

COMMITMENT:

Updating drawings identified in Notice of Violation as required by WNP-2-018, Drawing Control Log and Specification Log.

COMMITMENT:

Perform audits/surveillance of the Design Control Logs by Burns and Roe Quality Engineering.

COMMITMENT:

Retraining of personnel responsible for updating drawings prior to June 15, 1981.

COMMITMENT:

Insulation resistance testing on SSW-P-1A is scheduled for completion prior to July 30, 1981.