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SUBJECT: Forwards updated response to revised sections of App B per
 820112-14 meetings. Response to be incorporated in Amend 24
 of FSAR.

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Washington Public Power Supply System

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January 29, 1982
G02-82-125

Docket No. 50-397

Mr. A. Schwencer, Director
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
APPENDIX B REVISIONS

Enclosed are sixty (60) copies of the updated response to revised sections of Appendix B (WNP-2 response to Regulatory Issues resulting from TMI-2) discussed in the Licensee Qualification meeting held at the Supply System January 12 through 14, 1982. These pages will be incorporated into Amendment 24 of the WNP-2 FSAR.

Very truly yours,

G. D. Bouchey
Deputy Director, Safety and Security

KSN/kp
Enclosures

cc: R Auluck - NRC
WS Chin - BPA
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Boo
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I.C.6 GUIDANCE ON PROCEDURES FOR VERIFYING CORRECT PERFORMANCE OF OPERATING ACTIVITIES

Position

It is required (from NUREG-0660) that licensees' procedures be reviewed and revised, as necessary, to assure that an effective system of verifying the correct performance of operating activities is provided as a means of reducing human errors and improving the quality of normal operations. This will reduce the frequency of occurrence of situations that could result in or contribute to accidents. Such a verification system may include automatic system status monitoring, human verification of operations and maintenance activities independent of the people performing the activity (see NUREG-0585, Recommendation 5), or both.

Implementation of automatic status monitoring if required will reduce the extent of human verification of operations and maintenance activities but will not eliminate the need for such verification in all instances. The procedures adopted by the licensees may consist of two phases - one before and one after installation of automatic status monitoring equipment, if required, in accordance with item I.D.3.

Clarification

Item I.C.6 of the U.S. Nuclear Regulatory Commission Task Action Plan (NUREG-0660) and Recommendation 5 of NUREG-0585 propose requiring that licensees' procedures be reviewed and revised, as necessary, to assure that an effective system of verifying the correct performance of operating activities is provided. An acceptable program for verification of operating activities is described below.

The American Nuclear Society has prepared a draft revision to ANSI Standard N18.7-1972 (ANS 3.2), "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." A second proposed revision to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," which is to be issued for public comment in the near future, will endorse the latest draft revision to ANS 3.2 subject to the following supplemental provisions:

- a. Applicability of the guidance of Section 5.2.6 should be extended to cover surveillance testing in addition to maintenance.
- b. In lieu of any designated senior reactor operator (SRO), the authority to release systems and

equipment for maintenance or surveillance testing or return-to-service may be delegated to an on-shift SRO, provided provisions are made to ensure that the shift supervisor is kept fully informed of system status.

- c. Work permits involving tagging for maintenance or surveillance testing are verified by the Shift Manager (or his designee) for correct implementation of control measures. Independent verification by qualified individuals is made for installation or removal of temporary modifications such as jumpers, lifted leads or bypass lines. Routine independent verification of equipment status at the location of the equipment will be performed for return-to-service activities of all important safety-related equipment having no control room status indications. These verifications will be by qualified equipment operators.
- d. Equipment control procedures should include assurance that control room operators are informed of changes in equipment status and the effects of such changes.
- e. For the return-to-service of equipment important to safety, a second qualified operator should verify proper systems alignment unless functional testing can be performed without compromising plant safety, and all equipment, valves and switches involved in the activity are correctly aligned.

NOTE: A licensed operator possessing knowledge of the systems involved and the relationship of the systems to plant safety would be a "qualified" person. The staff is investigating the level of qualification necessary for other operators to perform these functions.

For plants that have or will have automatic system status monitoring as discussed in Task Action Plan Item I.D.3, NUREG-0660, the extent of human verification of operations and maintenance activities will be reduced. However, the need for such verification will not be eliminated in all instances.

WNP-2 Position

WNP-2 will prepare or revise procedures as necessary to implement an effective system for verification of operating activities important to safety. These procedures will be implemented prior to fuel load. The preparation of these procedures will be guided by ANS 3.2 Section 5.2.6 and the following supplemental provisions:

- a. ANS 3.2 Section 5.2.6 will be applied to both maintenance and surveillance.
- b. The Shift Manager will have the designated responsibility for implementing procedures for release of systems and equipment for maintenance or surveillance testing and for return-to-service. This responsibility may be delegated to any other Licensed Senior Reactor Operator (SRO) stationed within the control room. The Shift Manager will remain informed by reviewing records and receiving turnover.
- c. Work permits involving tagging for maintenance or surveillance testing are verified by the Shift Manager (or his designee) for correct implementation of control measures. Independent verification is also made for installation or removal of temporary modifications such as jumpers, lifted leads, or bypass lines. Routine independent verification of equipment status at the location of the equipment will be performed for return-to-service activities of all important safety-related equipment having no control room status indications.
- d. Equipment control procedures are implemented through the control room such that control room personnel are aware of changes being made in equipment status and the effects of such changes.
- e. Activities for the return-to-service of equipment important to safety are verified by the Shift Manager (or his designee) for correct implementation of control measures. Independent verification is also made for installation or removal of temporary modifications such as jumpers, lifted leads or bypass lines. Routine independent verification of status at the location of the equipment is limited to return-to-service activities performed prior to startups following refueling or long-term outages in accordance with the ALARA concept to limit accumulation of personnel radiation exposures.

I.A.1.2 Shift Supervisor Responsibilities

Position (NUREG-0578, 2.2.1.A)

- a. The highest level of corporate management of each licensee shall issue and periodically reissue a management directive that emphasizes the primary management responsibility of the shift supervisor for safe operation of the plant under all conditions on his shift and that clearly establishes his command duties.
- b. Plant procedures shall be reviewed to assure that the duties, responsibilities, and authority of the shift supervisor and control room operators are properly defined to effect the establishment of a definite line of command and clear delineation of the command decision authority of the shift supervisor in the control room relative to other plant management personnel. Particular emphasis shall be placed on the following:
 1. The responsibility and authority of the shift supervisor shall be to maintain the broadest perspective of operational conditions affecting the safety of the plant as a matter of highest priority at all times when on duty in the control room. The idea shall be reinforced that the shift supervisor should not become totally involved in any single operation in times of emergency when multiple operations are required in the control room.
 2. The shift supervisor, until properly relieved, shall remain in the control room at all times during accident situations to direct the activities of control room operators. Persons authorized to relieve the shift supervisor shall be specified.
 3. If the shift supervisor is temporarily absent from the control room during routine operations, a lead control room operator shall be designated to assume the control room command function. These temporary duties, responsibilities, and authority shall be clearly specified.
- c. Training programs for shift supervisors shall emphasize and reinforce the responsibility for

safe operation and the management function of the shift supervisor is to provide for assuring safety.

- d. The administrative duties of the shift supervisor shall be reviewed by the senior officer of each utility responsible for plant operations. Administrative functions that detract from or are subordinate to the management responsibility for assuring the safe operation of the plant shall be delegated to other operations personnel not on duty in the control room.

Clarification

The table attached provides clarification to the above position.

WNP-2 Position

The administrative duties of the Shift Manager will be reviewed; inappropriate functions will be delegated to other personnel including the Shift Support Supervisor. The Shift Support Supervisor will assist the Shift Manager by directing personnel assigned to perform balance-of-plant operating functions and by performing shift administrative duties.

WNP-2 procedures will be reviewed to ensure that the Shift Manager, Control Room Supervisor, Shift Support Supervisor and Operator's functions are defined adequately to establish the Shift Manager as the commanding authority for plant operations relative to other plant management. The Shift Manager is to ensure the safe operation of the plant under all conditions. During an emergency, the responsibility for directing and controlling the actions of the operating crew to place and maintain the plant in a safe condition rests with the Shift Manager. During accident conditions, the Shift Manager will be in the control room at all times until properly relieved.

This principle will be reinforced by a management directive issued annually from the office of the Director of Generation that emphasizes that the Shift Manager's primary responsibility is the safe operation of the plant under all conditions.

The Shift Manager's administrative duties will be reviewed annually by the Plant Manager to ensure that administrative responsibilities do not interfere with the primary responsibility.

Appropriate documentation will be available onsite for review by NRC and I&E Branch.

I.C.2 SHIFT AND RELIEF TURNOVER PROCEDURES

Position

The licensees shall review and revise as necessary the plant procedure for shift and relief turnover to assure the following:

- a. A checklist shall be provided for the oncoming and offgoing control room operators and the oncoming shift supervisor to complete and sign. The following items, as a minimum, shall be included in the checklist.
 1. Assurance that critical plant parameters are within allowable limits (parameters and allowable limits shall be listed on the checklist).
 2. Assurance of the availability and proper alignment of all systems essential to the prevention and mitigation of operational transients and accidents by a check of the control console (what to check and criteria for acceptable status shall be included in the checklist).
 3. Identification of systems and components that are in a degraded mode of operation permitted by the Technical Specifications. For such systems and components, the length of time in the degraded mode shall be compared with the Technical Specifications action statement (this shall be recorded as a separate entry on the checklist).
- b. Checklists or logs shall be provided for completion by the offgoing and ongoing auxiliary operators and technicians. Such checklists or logs shall include any equipment under maintenance or test that by themselves could degrade a system critical to the prevention and mitigation of operational transients and accidents or initiate an operational transient (what to check and criteria for acceptable status shall be included on the checklist).
- c. A system shall be established to evaluate the effectiveness of the shift and relief turnover

procedure (for example, periodic independent verification of system alignments).

Clarification

None

WNP-2 Position

The Control Room Operators checklist will be designed to do the following:

1. Ensure that critical plant parameters are monitored and are within allowable limits.
2. Ensure the availability and correct alignment of essential systems.
3. Identify all systems or components which are in a degraded mode of operation and compare each length of time in the degraded mode to technical specification action requirements.

The off-going and on-coming Shift Manager, Control Room Supervisor and Control Room Operator positions will signify checklist status and content.

A checklist designed for balance-of-plant shift turnover will identify any equipment under maintenance or test which could either; (a) by itself degrade a system which is critical to the prevention and mitigation of operational transients and accidents, or; (b) initiate an operational transient.

Off-going and on-coming Shift Support Supervisors will signify checklist status and content for the balance-of-plant checklists.

WNP-2 will establish a system to evaluate the effectiveness of the shift and relief turnover procedure.

I.C.4 CONTROL ROOM ACCESS

Position (NUREG-0578 2.2.2.A)

The licensee shall make provisions for limiting access to the control room to those individuals responsible for the direct operation of the nuclear power plant (e.g., operations supervisor, shift supervisor, and control room operators), to technical advisors who may be requested or required to support the operation, and to predesignated NRC personnel. Provisions shall include the following:

- a. Develop and implement an administrative procedure that establishes the authority and responsibility of the person in charge of the control room to limit access, and
- b. Develop and implement procedures that establish a clear line of authority and responsibility in the control room in the event of an emergency. The line of succession for the person in charge of the control room shall be established and limited to persons possessing a current senior reactor operator's license. The plan shall clearly define the lines of communication and authority for plant management personnel not in direct command of operations, including those who report to stations outside of the control room.

Clarification

None

WNP-2 Position

A WNP-2 procedure will be prepared and implemented to establish the Shift Manager (SR0) and in his absence, the Control Room Supervisor (SR0) as the authority and responsibility for limiting access to the control room. Nonessential personnel will be excluded from the Control Room when their presence is hampering operations. Nonessential personnel are defined as those not required by the Shift Manager to assist in safe plant operation and may include anyone not normally assigned a shift control room position. If required, plant security will be utilized to enforce the policy.

Additionally, procedures establish the same line of succession from control room authority and responsibility in the event of an emergency. The procedures will specifically address lines of communication and authority for management personnel not in direct command of operations and assigned responsibilities outside the control room. Instructions or orders impacting operations will be relieved by the Operations Manager and transmitted to the Shift Manager.