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

Docket No. 50-397

April 17, 1985

G02-85-206

Mr. J.B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION 85-05
FEBRUARY 4-8, 1985

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in Appendix A of your letter dated March 19, 1985. Our reply pursuant to the provisions of Section 2.201, Title 10 Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, an explanation of the violation is presented, the corrective steps taken with results achieved are outlined, and the date of full compliance is specified.

Should you have any questions concerning our response, please do not hesitate to contact me.

G.C. Sorensen
Manager, Regulatory Programs

GCS:mm
Attachment

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IE-01

APPENDIX A

As a result of the inspection conducted February 4-8, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following two violations were identified:

1. Licensee Technical Specification 6.8.1 states in part:

   "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

   g. Fire protection program implementation.

   Licensee procedure, Plant Procedures Manual Chapter 1.3.10, Fire Protection Program, Section 1.3.10.6, Fire Brigade Procedure Section B.1 states in part:

   "Drills will be conducted at least four times per year per shift. Each brigade member must participate in at least two of the four drills each year."

   Contrary to the above, at the time of the inspection, two plant fire brigade members had not attended any of the required drills in 1984.

   This is a Severity Level V Violation (Supplement I)

Validity of Violation

The Supply System acknowledges the validity of this violation but feels that the violation should be clarified for the following reasons:

Supplementary research revealed that the status of the two (2) fire brigade members is in error. One of the members had attended all required drills; the documentation was such that this was not obvious during the initial inspection review. The second fire brigade member did not complete all the required drills for 1984 and therefore was not qualified after 12/14/84 (the date of the last drill in 1984). This individual completed only one drill in 1984.

PPM 1.3.10 "Fire Protection Program" Section 6, delineates the manpower, by discipline, assigned to the fire brigade. The brigade consists of (1) Shift Support Supervisor, (1) Health Physics (HP) technician and (3) Equipment Operators (EO's). The one person not meeting the 1984 drill requirement was an Equipment Operator and was relied upon during several periods as fulfilling Fire Brigade manning requirements. Additional Fire Brigade qualified EO's were on shift during these periods and would have been available to support Fire Brigade activities (had they been required) for any lack of performance evidenced by the non-qualified EO.

Corrective Steps Taken/Results Achieved:

1) A special make-up drill was held on 2/13/85 (within thirty (30) days after the discovery) to requalify the individual that had not met his drill requirements.

2) The documentation and tracking system has been reviewed and improved to increase its effectiveness with regard to identifying Fire Brigade training requirements in advance of expiration dates. A manual tracking system is in place which identifies training requirements and records the date training was conducted for each Fire Brigade member. This information will be provided to Operations management and will be periodically reviewed for upcoming traing requirements. This is expected to prevent a recurrence of this violation.

3) A review of all fire brigade personnel status was conducted. All persons presently assigned to the brigade have met all the requirements of PPM 1.3.10.6, "Fire Brigade Procedure".

Date of Full Compliance

Full compliance was achieved by April 1, 1985.

2. Licensee Technical Specification 6.8.1 states in part:

"Written procedures shall be established, implemented, and maintained covering the activities referenced below:

g. Fire Protection Program Implementation.

Licensee procedure, Plant Procedures Manual (PPM) Chapter 1.3.10, Fire Protection Program, Section 1.3.10.7, Storage and Use of Flammable or Combustible Material Procedure, states in part:

"A. Flammable or combustible materials, combustible and flammable gases and liquid, high efficiency particulate air and charcoal filters, dry ion exchange resins, or other combustible supplies (in the main plant structures) shall not be stored in critical plant areas (see Attachment III).

B. Storage of combustible materials shall be allowed only within the marked boundaries of designated storage areas.

D. All waste, debris, scrap, oil spills, or other combustibles resulting from the work activity shall be removed from the area immediately following completion of the activity or at the end of each work shift, whichever comes first."

Attachment III to PPM Chapter 1.3.10 states in part:

"Critical Plant Areas;

I. Reactor Building in its Entirety.

II. Diesel Generator Building in its Entirety."

Contrary to the above, at the time of the inspection, the following conditions existed:

a. In the Diesel Generator Building, Room D113, under some Division B Diesel Generator Cables, there was about 6000 lbs of Class A combustibles, including 40 cardboard boxes with a large roll of plastic inside, 16 unboxed rolls of plastic, a wood pallet, cardboard boxes containing masking tape, rubber gloves and aerosol cans.

b. In the Reactor Building on each level there were four large open cabinets each filled with Class A combustibles, consisting of anti-contamination clothing, rubber boots, gloves, tape and plastic.

c. On the 471' level of the Reactor Building there was a roll of plastic still in its brown paper wrapping and a plywood box of wood with respirators in it.

d. Several plastic bags of unattended trash were on the 422' elevation of the Reactor Building.

This is a Severity Level IV Violation (Supplement I)

VIOLATION 2(a)

In the Diesel Generator Building, Room D113, under some Division B Diesel Generator Cables, there was about 6000 lbs. of Class A combustibles, including 40 cardboard boxes with a large roll of plastic inside, 16 unboxed rolls of plastic, a wood pallet, cardboard boxes containing masking tape, rubber gloves and aerosol cans.

Validity of Violation

The violation correctly identifies the storage of combustibles in an area not previously designated as such by PPM 1.3.10.

Room D113 is designated as a Laundry Storage Room on existing plant drawings. Due to the inadequate amount of designated storage, room D113 was being utilized to provide additional storage space.

Corrective Steps Taken/Results Achieved

All combustibles stored in the room have been removed.

Corrective Steps To Be Taken

1) The room will be evaluated to determine the type and quantities of storage which can be permitted. If necessary, a modification will be made to the fire protection system.

2) PPM 1.3.10, Fire Protection Program, will be revised such that the room will be designated for controlled storage.

Date of Compliance

1) Combustible materials were removed by February 12, 1985.

2) The evaluation will be completed by May 1, 1985.

3) PPM 1.3.10 will be revised by June 1, 1985.

VIOLATION 2(b)

In the Reactor Building on each level there were four (4) large open cabinets each filled with Class A combustibles, consisting of anti-contamination clothing, rubber boots, gloves, tape and plastic.

Validity of Violation

The violation correctly identifies the storage of Class A combustibles on various levels of the Reactor Building. The Class A combustibles consisted of anti-contamination clothing used while performing maintenance throughout the Reactor Building.

Corrective Steps Taken/Results Achieved

The Class A combustibles have been reviewed by the Fire Protection Engineer and Health Physics personnel. This evaluation determined the minimal amount of clothing needed for each elevation. The evaluation also determined the location and configuration of the Class A combustibles that will present the least amount of hazard to the safety related equipment.

Corrective Steps To Be Taken

Designated storage areas and the amount of storage allowed will be added to the Fire Hazard Analysis (FHA). Emphasis will be placed on the enforcement of established procedures to assure that all future storage areas are properly evaluated.

Date of Full Compliance

The next FHA update will include the location and amount of Class A combustibles. The next FHA update is scheduled for December 1985. Any hardware required will be in place by September 1, 1985.

VIOLATION 2(c)

On the 471' level of the Reactor Building there was a roll of plastic still in its brown paper wrapping and a plywood box of wood with respirators in it.

Validity of Violation

The violation correctly identifies incorrect storage of combustible materials on the 471' level of the Reactor Building.

The roll of plastic was to be utilized by HP for "STEP OFF PAD" construction at a dress out area. Only the required amount of plastic was kept at this location. The plywood box was utilized to gather defective/extra escape breathing apparatus from the Reactor Building. This box should not have been used per PPM 1.3.10.

Corrective Steps Taken/Results Achieved

The brown paper wrapping was removed from the roll of plastic and properly removed from the area. The remaining plastic was placed in its proper location, for utilization by Health Physics personnel.

The plywood box has been removed.

Corrective Steps To Be Taken

1) Special emphasis will continue to be placed on the limiting of combustibles in the Reactor Building, as well as throughout the plant. Applicable plant personnel (e.g. Operations, Maintenance and Health Physics departments) will be required to periodically review the applicable section of 1.3.10.

2) PPM 1.3.10 will be revised to address the locations where plastic may be retained for use in future construction of "STEP OFF PAD" and supporting boundary areas.

Date of Full Compliance

1) Combustible material storage compliance was achieved on April 1, 1985.

2) PPM 1.3.10 will be revised by June 1, 1985.

VIOLATION 2(d)

Several plastic bags of unattended trash were on the 422' elevation of the Reactor Building

Validity of Violation

The violation correctly identifies actions that are contrary to PPM 1.3.10. Bags of trash were left unattended in the Reactor Building.

An investigation of this finding revealed that the bags of trash were part of a janitorial/housekeeping effort by the laborers.

Corrective Steps Taken/Results Achieved

The laborers have been instructed not to leave collected trash unattended when performing housekeeping in the Reactor Building.

The plastic bags have since been removed.

Corrective Steps To Be Taken

Laborers will be required to periodically review the applicable section of PPM 1.3.10.

Date of Full Compliance

Full compliance was achieved by April 1, 1985.

Violation 2 Summary

The Plant's assessment of our performance with regard to Violation 2 is that we have not done an adequate job of meeting Fire Protection Program requirements with regard to combustible material storage. There are several reasons for this:

1) Present Reactor Building design will support specific amounts of combustible materials in the different building areas. The present PPM does not address the types, or amount, of combustible materials that are allowed under present Fire Protection System design. Currently, PPM 1.3.10 lacks the specificity for directions required to store flammable materials in areas designed with sufficient protection.

2) The procedure (PPM 1.3.10) is overly restrictive and difficult to apply.

The revision of PPM 1.3.10 will attempt to correct these conditions as well as meet the committments given to satisfy individual violations noted in this response. The Plant's corrective action will include emphasizing to all Plant personnel our obligations under PPM 1.3.10.