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

Docket No. 50-397

July 2, 1985
G02-85-357

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 85-11
APRIL 15-26, 1985

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in Appendix A of your letter dated June 3, 1985. Our reply to the Notice of Violation 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.

As requested in the transmittal letter for this inspection report, we have also addressed the four areas of perceived weakness and included our plans for evaluating and resolving the issues. These issues are addressed in Appendix B (attached).

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

GC. Sorensen
Manager, Regulatory Programs

GCS:jmc
Attachment

IE-01

APPENDIX A

As a result of the NRC inspection conducted April 15-26, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violations were identified:

I. TS 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

The applicable procedures recommended in Appendix A of R.G. 1.33, Rev. 2, February 1978."

1. WNP-2 Administrative Procedure 1.5.4 Section 6.F.1 states "A M&TE Daily Usage Record shall be provided at the M&TE tool cribs with each piece of M&TE as it is checked out for personnel to complete during usage each day. When an individual will no longer need the M&TE (NOT TO EXCEED FIVE CALENDAR DAYS) or at the end of each day, the completed record is returned with the M&TE to its storage site."

   Contrary to the above, on April 24, 1985:

   a. IRD 820 Vibration Monitor No. 38131 was in use in the mechanical shop without having been signed out of the M&TE tool crib and without a Daily Usage Record.

   b. IRD 820 Vibration Monitor No. 40928 had been transferred for use from operations to the mechanical shop. A Daily Usage Record was not being maintained and the monitor was not being returned to the M&TE tool crib after use or at end of each day.

   c. Both of the above monitors were being used in the field without current calibration data in the M&TE tool crib.

2. WNP-2 Administrative Procedure 1.5.4 Section 6.E.2 states "A quarantine locker shall be used for all test equipment removed from service or awaiting calibration."

   Contrary to the above, on April 24, 1985, in contaminated M&TE storage on the 525 feet level of the Reactor Building, five M&TE Test Gauges overdue for calibration were stored with gauges not overdue for calibration.

3. WNP-2 Administrative Procedure 1.5.4 Section 6.E.1 states "When not checked out, M&TE shall be maintained under controlled storage conditions."

Contrary to the above, on April 24, 1985, certain M&TE instruments overdue for calibration could not be found, were not checked out and have not been maintained under controlled storage conditions.

This is a Severity Level IV Violation (Supplement I).

Validity of Violation

Item I.1

It is agreed that there was a breakdown in implementation of the M&TE program requirements for the circumstances surrounding the described use of the model 820 IRD's. Both units were in use without Daily Usage Records being maintained, one unit was not signed out on tool crib records and control of the other unit had been transferred without being returned to the tool crib. All of the above items are in conflict with the approved procedure governing the M&TE program.

However, the reference to the length of time these units were used in the field without being returned to the tool crib should be clarified. In January of 1985, a procedure change was processed which allowed continued use in the field without returning equipment to the tool crib. This change deleted the original five day use limitation referred to in the violation. The activities described conformed with the existing procedural guidance governing the length of time equipment can be used in the field without return to the tool crib.

It is also agreed that these monitors were being used in the field without current calibration data existing in the tool crib. These units had been delivered to the Control Room without first being checked into the tool crib. The offsite calibration facility returned the instruments with the correct documentation, however plant personnel receiving this documentation failed to transmit it to the tool crib in a timely manner. This was an administrative deficiency only and no equipment was found in use without current calibration.

Item I.2

The Supply System concurs with this portion of the violation description as stated. It was not originally intended that a quarantine area be established within the radiologically controlled area.

Item I.3

The Supply System concurs with this portion of the violation as stated. However, it should be noted that the specific instruments cited in this case were of two particular categories. The first category involved equipment that was no longer required to be calibrated per the M&TE program but had not been removed from the M&TE listing. These instruments were being controlled under the Plant Scheduled Maintenance System. The other category involved equipment which was thought to have been inadvertently returned to the vendor with a non-functional piece of equipment. This subject was being pursued with the vendor at the time of the inspection.

Corrective Action

Item I.1

- Maintenance craft personnel were reinstructed on the use of Daily Usage Records and transfer restrictions for M&TE. (See also Appendix B response to Item I.)

- The calibration facility now returns all M&TE along with supporting documentation, to the Tool Crib. This should prevent recurrence of the described situation. A follow-up letter has been sent to the calibration facility that reemphasizes the importance of adhering to this interface mechanism.

- The Supply System will increase line management involvement in the monitoring and enforcement of procedural compliance in this area.

- In addition, the IRD assigned to the Control Room has been tagged to specify that it may not be transferred to another organization/person without first being checked into the tool crib.

Item I.2

- As an interim corrective action, a contaminated equipment quarantine storage cabinet was installed on the 525' level of the Reactor Building. This storage cabinet is kept locked and is now being used to segregate contaminated instruments which are approaching or past their calibration due date. A twice weekly verification of the 525' level of the Reactor Building is made to ensure that this segregation is maintained.

- o In response to internally identified weakness in this area, the Plant had previously decided to move the M&TE tool crib into the radiologically controlled area . This will enable tool crib personnel to have better control of potentially contaminated equipment.

Item I.3

- o The listing of "overdue for calibration" equipment has been reviewed for accuracy. The NRC Inspector identified items, as well as several items identified by Plant Staff, were removed from the listing of equipment controlled under the M&TE program since the M&TE program requirements were no longer applicable.

Date of Full Compliance

- o The tool crib move will be effected prior to 10/1/85.
- o All other corrective actions were completed prior to this response date.

II. TS 6.2.3.2 states in part, "The NSAG shall be composed of at least five, dedicated, full-time engineers, a minimum of three located onsite and two at the home office...."

Contrary to the above, at the time of the inspection no members of NSAG were located at the home office.

This is a Severity Level V Violation (Supplement I).

Validity of Violation

The Supply System concurs that the Nuclear Safety Assurance Group (NSAG) was not in compliance with a literal interpretation of the technical specification (TS) requirement. However, it should be noted that the intent of this TS was to ensure NSAG was comprised of five dedicated, full-time engineers and to allow two engineers to be located at the home office. The intent of the WNP-2 staff and NRC personnel who developed this TS was not to direct that two engineers must be located at the home office at all times.

Corrective Action

A change to Technical Specification 6.2.3.2 (NSAG Composition) is being processed for submittal to the NRC. This change will result in normal NSAG composition being in strict compliance with the Technical Specification wording. The proposed Section 6.2.3.2 wording will be "The NSAG shall be composed of at least five dedicated, full-time engineers with a minimum of three located on site."

Date of Full Compliance

The TS change will be submitted to the NRC by 7/15/85.

III. TS 6.5.2.7 states in part, "The CNSRB shall review:

The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question...."

Contrary to the above, at the time of the inspection, the full CNSRB were not reviewing all safety evaluations of procedure changes, modifications and test and experiments. The Executive Secretary of the CNSRB was independently reviewing all of the evaluations and selecting which items should go to the full CNSRB for review.

This is a Severity Level V Violation (Supplement I).

Validity of Violation

The Supply System does not agree with the Level V violation issued for the interpretation that the Corporate Nuclear Safety Review Board (CNSRB) is not following the WNP-2 Technical Specifications as written. The words "The CNSRB shall review:" do not state that each member shall review each item associated with the remainder of the section. The phrase does not preclude individual reviews with reports to the membership by subcommittee and/or technical specialists. The Supply System is not alone in its intrepretation of the non-restrictiveness of the phrase. This Technical Specification was derived from Standard Technical Specifications language and all utilities contacted that have the same wording in their Technical Specifications also have an interpretation identical to the Supply System's.

The interpretation, as made in the enforcement action, is not desirable to implement as it impedes the goals of the CNSRB. The review effort is significant with the majority of documents easily recognized as having no safety impact. By requiring each member to review all documents, the significant issues could easily be obscured by the sheer magnitude of records alone. Therefore, it is only practical to have some screening of the documentation by knowledgeable person(s) in accordance with CNSRB rules. This allows the CNSRB to focus on those issues that have real or potential safety significance. This has been the method used by all utilities contacted who have the same phrase in their Technical Specifications.

Corrective Action

The Supply System asserts it has been in full compliance with this TS at all times.

Date of Full Compliance

Not applicable.

IV. TS 4.6.1.1.b states, "Primary Containment Integrity shall be demonstrated:

At least once per 31 days by verifying that all primary containment penetrations** not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.3-1 of Specification 3.6.3."

Contary to the above, on March 18, 1985 four of the stated type valves located above the reactor water cleanup vault were not verified to be closed from January 17, 1985 to March 18, 1985.

This is a Severity Level IV Violation (Supplement I).

Validity of Violation

The Supply System concurs with the validity of this violation, however, the violation should be clarified for the following reason.

The radiation levels (60 to 200 mr) identified in the Summary of Report No. 50-397/85-11 Detail 3 were for power levels other than 100%. Actual radiation levels in the Reactor Water Cleanup (RWCU) pump rooms at 100% power are 600 mr/hr general with some areas as high as 3000 mr/hr. In addition the RWCU pump rooms are considered to be airborne contaminated areas. Thus, due to the high radiation levels in the RWCU pump rooms, the areas immediately above the pump rooms are considered as high radiation areas and personnel are not permitted to enter these areas with the plant in startup or power operation. PPM 1.11.2, "As Low as Reasonably Achievable (ALARA) Program", describes the plant ALARA program and defines the responsibilities for its implementation. It is Supply System policy, and a goal of the plant, to maintain radiation exposures consistent with ALARA philosophy and below the limits of 10CFR20.

The Supply System agrees that our timeliness in pursuing the Technical Specification change in this instance was not in accordance with either Plant Management's or the NRC's expectations.

Corrective Action Taken

- The surveillance test TSS-PN-7.4.6.1.1, "Primary Containment Integrity Verification", which includes the four valves (RWCU-V-611, 612, 607 and 608) located above the RWCU pump room, was commenced at 0001 hours on February 16, 1985 with the plant in shutdown condition. Prior to completion of TSS-7.4.6.1.1 the plant conditions changed to power operation and personnel were restricted from entering the area above the RWCU pump room. Since the RWCU valves in question could not be visually verified closed, the area temperatures were monitored and found to be normal which indicated system integrity (i.e., the valves were indeed closed).

- The following Plant Technical Specification change was proposed by the Supply System and sent to the NRC on April 25, 1985.

  4.6.1.1(b)**

  Except valves, blind flanges and deactivated valves within the primary containment or other areas administratively controlled to prohibit access for reasons of personnel safety (e.g., radiation or temperature) shall be locked, sealed or otherwise secured in the closed position. Valves inside containment shall be verified closed following primary containment de-inerting, but verification is not required more than once per 92 days. Valves in other administratively controlled areas shall be verified closed during each cold shutdown, but verification is not required more than once per 31 days.

- Subsequent TSS-7.4.6.1.1 surveillance tests have been conducted when scheduled and if the reactor plant was in power operation at time of test, the RWCU-V-611, 612, 607 and 608 were verified closed during the next plant shutdown.

- Radiation levels in the RWCU pump rooms are proportional to power level. Therefore, during future performance of this surveillance test, an ALARA evaluation will be performed and used as a basis for determining whether these valves' position will be verified. In cases where valve position is not physically verified, alternate means will be used to verify that these valves are shut. The valves in question are vent and drain valves and monitoring area temperatures will verify that the valves are indeed shut.

Date of Full Compliance

- The date of full compliance with the Technical Specification requirement will coincide with the disposition of Technical Specification change request.

- With regard to the issue of timeliness, Plant Management intends to reemphasize the necessity of properly documenting and resolving issues relating to the performance of Technical Specifications required testing. Supervisors and surveillance test reviewers in each department will receive direction concerning the handling of discrepancies with Technical Specification requirements. Personnel will also be instructed to use our recently approved Technical Specification interpretation procedure when difficulty is experienced in applying the Technical Specifications language. By using these two mechanisms, Plant Management intends to ensure issues dealing with Technical Specifications compliance are promptly identified and resolved. This issue has already been discussed at Plant Management Staff meetings and further direction will be provided to Plant personnel by July 12, 1985.

APPENDIX B

As a result of the NRC inspection conducted April 15-26, 1985, the following areas of perceived weakness were observed.

1. Implementation of Measuring and Test Equipment (M&TE) Program:

   ".... the team found an overdue-for-calibration list of M&TE that could not be located, M&TE being used and not signed out, no records being made of where the M&TE was being used and M&TE being loaned from one department to another without being checked through the tool crib, etc."

   Response

   The Supply System had previously been aware of certain weaknesses in implementing the M&TE program requirements. As noted in our response to your perceived weakness No. 2, this awareness had instigated a request for increased QA surveillance of this area. As a result of these surveillances and the observations contained above, the Plant has identified the following actions to improve implementation of the M&TE program. These actions are in addition to the response to violation I contained in Appendix A.

   - In order to adequately assess craft performance with regard to checking M&TE back into the tool crib, the I&C Department Supervisor will receive a daily report on equipment not turned in. This report will commence July 1, 1985 and continue only for the time necessary to evaluate performance. Subsequent actions will be identified at this time if required.

   - An inventory of all equipment covered by the M&TE program will be completed by July 1, 1985, to identify discrepancies. Any discrepancies discovered will be resolved at that time. Those discrepancies identified during the NRC audit have already been rectified.

   - Maintenance supervisors and craft personnel have been instructed that M&TE must be checked out and returned to the tool crib and to maintain the daily usage logs. Plant maintenance supervision will monitor these activities to assure future performance.

   - In order to ensure that no M&TE is removed from the tool crib without being checked out, strengthened checkout controls are being implemented. On back shifts, when tool crib personnel are not on duty, only the on-duty I&C Technician will have access to the tool crib area for equipment checkout purposes. Previously, access to M&TE was not restricted in this manner. Controlling access in this manner should improve the record keeping for M&TE checkout. This policy will be implemented by July 12, 1985.

- Existing procedural guidance exists and should have been followed to document the above noted discrepancies. The tool crib attendants did not follow this guidance and will receive additional instruction by July 12, 1985 on the use of the Plant Deficiency Report (PDR) to document significant or repetitive non-conformances with the M&TE program. Use of the PDR to document deficiencies in the M&TE program implementation will help ensure that corrective action is addressed and assist in highlighting recurring problem areas.

- An overall M&TE program assessment is planned for completion by August 1, 1985. This effort will evaluate the M&TE programs of other nuclear facilities for possible WNP-2 program improvements. Any desired improvements identified by the review process, will be incorporated into a future procedure revision of PPM 1.5.4.

2. Management Oversight of Onsite QA Surveillance Program:

"....the onsite QA surveillance program had identified most of the same problems in the M&TE program identified by the team in a series of surveillances performed between September 1, 1984 and January 31, 1985. Corrective action on each finding was taken, but because of the lack of proper management oversight, the M&TE programmatic break down was not recognized."

Response

In examining the circumstances surrounding the examples which provided the basis for this perceived weakness, it should be noted that Plant Management had requested increased QA surveillance activity in the area of M&TE, hence the reason that four QA surveillances of M&TE were performed in a period of four and a half months. It should be further noted the Supply System feels that significant conditions identified in QA surveillances which are adverse to quality are being documented, reported and resolved at appropriate levels of Management. It is acknowledged that Management had not effectively corrected some of the items which were of a repetitive nature. However, this concern was receiving continued Management and QA attention in order to implement, and monitor implementation of, the M&TE program requirements.

It is recognized the corrective action taken for the deficiencies identified did not totally preclude recurrence and that a repetitive QA surveillance deficiency may be significantly adverse to quality. Therefore, the following programmatic areas will be reviewed and upgraded as necessary to assure:

- The mechanism by which QA surveillance engineers review past deficiencies in order to evaluate current activities and identify repetitive problems is adequate.

- The existing deficiency escalation policy provides timely notification of recurrent problems and a request for corrective action from appropriate levels of Management.

These reviews will be completed by August 1, 1985.

3. Compliance with the Letter of Technical Specifications:

"..... as noted in the NOV, from the Corporate Nuclear Safety Review Board down to lower levels in the plant, decisions were being made to deviate from the letter of the technical specifications without the Supply System taking steps to change the technical specifications."

Response

Contained within the body of the Administrative Control Audit Inspection report are references to three (3) instances in which Supply System management was perceived as fostering practices of conduct not consistent with the literal wording of applicable sections of the Technical Specifications. In addition, the report states the Supply System failed to take the necessary steps to amend Technical Specification requirements to bring existing practices into compliance. From these examples, a perception was formed that all levels of the Supply System displayed a willingness to conduct business not in strict compliance with Technical Specifications. It has not been, nor is it presently, the policy of the Supply System, its management, or its employees to conduct licensed activities contrary to Technical Specifications or plant safety analyses which form the bases for the Specifications. Additionally, the Supply System has worked to change inappropriately configured requirements through the license amendment process established by the Office of Nuclear Reactor Regulation (NRR).

Many instances have occurred since issuance of our Operating License which were not specifically covered by our Plant Technical Specifications. In such cases, we have relied upon our detailed knowledge and clear understanding of the bases and intent of the requirements, and conservatively applied the safety assessments to guide our decisionmaking process and ensure safe operation.

Frequently, we have advised the NRC Resident Inspectors and/or the Regional Office early in this process to provide sufficient insight and understanding to such cases so that compliance with requirements is not an issue. In several instances, we have confirmed our evaluations of the bases and their implications to particular situations directly with NRR to ensure no deviation from regulations exist. For those areas not clearly resolved and for which a clarification of Technical Specifications is appropriate, we have submitted proposed changes and supported NRR in their review and approval process to amend our License. Because changes to Technical Specifications are License amendments, NRR action on Change Requests is very rigorous even for administrative, pro-forma revisions.

The WNP-2 Technical Specifications were developed from the Standard Technical Specifications language with plant specific data in part to alleviate both NRR and Licensee workloads in initial review and approval of the Technical Specifications. As a result of the more general language, instances where situations are not specifically addressed can be anticipated; therefore, Technical Specification interpretations are a necessity. In view of the License Amendment process and its requisite NRR workload, it was our understanding that Technical Specification Change Requests should be reserved for irrefutable inaccuracies for which strict compliance would require either significant levels of effort and/or resources with little increase in safety or, in strictly complying, cause Licensee actions potentially contrary to the overall safe operations of the facility.

This approach is consistent with present practice in the industry. Regulatory action to alter this approach would appear to be a shift in emphasis by the NRC away from knowledge and application of the bases for Technical Specifications, limited utilization of prudent operational philosophy, and reduced reliance on standardized Technical Specifications to a position that requires the document to specify every allowable action rather than defining bounds outside of which operation is limited, inside of which prudent judgment and operational flexibility would prevail.

In the one case cited which concerns primary containment verification, we acknowledge the lack of timeliness in submitting a clarification of the Technical Specifications to exempt the valves in question. This situation was modified during the period of time the Inspection Team was at WNP-2. In the remaining two (2) cases, License Amendments were not considered appropriate based upon our understanding of the NRR posture on these types of changes. These instances therefore, do not support the contention that the Supply

System is not responsive to resolving Technical Specification issues. Our evaluation indicates quite the contrary. We continue to strive for a high degree of compliance, resolve issues of significance, and strike a balance between interpretation and amendment consistent with NRR and IE constraints. As a consequence, we intend to continue our evaluation and interpretation process which we believe is in the best interest of public safety and regulatory concerns. Where it is not clear that the interpretation of a specific Technical Specification is without safety significance, the Supply System has, and will continue to, seek NRR and I&E guidance. In those cases where Technical Specification changes are appropriate, we will process the necessary License Amendments.

In the future we will work closely with the regional office through the resident inspectors to identify areas where the Technical Specifications have unclear wording or inappropriate limiting conditions for operation or surveillance requirements. While any required changes are processed, we will adopt appropriate interim corrective actions which will be discussed with the resident inspectors. Our newly established Technical Specification Interpretation procedure will provide a mechanism to document our evaluations of the operational implications of certain Technical Specification requirements as well as serve to define NRR's position on the licensing basis behind specific requirements. Satisfaction of the intent of Technical Specifications, conformance with the safety analysis and licensing basis of the Plant, and timely resolution of apparent discrepancies in requirements is our objective in this area.

4. Class I Battery Records

".... the records for the eight Class I batteries were not indentifiable and retrievable."

Response

The observation was correct in that certain records were produced "piece-meal over the two week inspection period". This was due in part to misunderstandings between the examiner and the Plant Staff as to the specific record types being requested and presented. The type of records being requested by the examiner also added to the time delay in retrievability. Certain procurement records had not been processed from Material Management to the appropriate records repository at WNP-2. This has not yet been completed. As stated by the examiner, startup and pre-operational records were produced to document operability. However, it is our understanding, contrary to the observation in the report, that all requested records were produced for the examiner during the duration of the inspection period. The processing of procurement records to their final records repository will be expedited. This program will be completed by October 1, 1985.