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Washington Public Power Supply System

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REGION V I&E

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Docket No. 50-307

July 11, 1985

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 REPORT 85-20

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 13, 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

for
G.C. Sorensen
Manager, Regulatory Programs

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Attachment

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WASHINGTON, D.C.

Appendix A

During an NRC inspection conducted on May 29-31, 1985 violations of NRC requirements were identified. The violations involved adherence to Technical Specification required procedures during a maintenance outage involving posting of radiation areas, labeling of radioactive material containers, work activities within the drywell and control of overtime for chemistry and health physics technicians. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1985) the violations are listed below:

- A. Technician Specification 6.2.2.f.2 states in part, "An individual should not be permitted to work ... more than 72 hours in any 7 day period ... Any deviation ... shall be authorized by the plant manager ... in accordance with written procedures and with documentation of the basis for granting the deviation". Procedures 1.3.27 step 5.F states in part that any deviation shall be approved and documented prior to approving the overtime.

Contrary to the above requirements, two individuals each worked 84 hours in seven consecutive days prior to May 10, 1985 when the approval was documented. In addition, the memorandum approved by the Plant Manager dated May 10, 1985 containing documentation of the approval did not provide the basis for granting the deviation. These two individuals worked 15 and 20 consecutive 12 hour days.

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

Validity of Violation

The Supply System concurs with the validity of this violation. Increased management and supervisory attention in this area is warranted.

Corrective Steps Taken/Results Achieved

- o A memorandum was issued by Plant Management to all Department Managers/ Supervisors reinforcing the requirements of PPM 1.3.27. This letter specifically identified the need for prior authorization of overtime deviations and provided guidelines for proper justification.

Corrective Steps To Be Taken

- o Plant Procedure 1.3.27, "Overtime Control" will be reviewed by the Plant Management for adequacy.



Date of Full Compliance

Since issuance of the Plant Management Memorandum on overtime control, proper overtime authorization and documentation requirements have been observed. The PPM 1.3.27 review will be completed during July, 1985 and any additional corrective action identified at that time.

- B. Technical Specification 6.11.1 states in part, "procedures ... shall be prepared consistent with the requirements of 10 CFR 20 and shall be ... adhered to ...". Plant Procedures Manual (PPM) 11.2.7.1, 'Areas Posting' states in part that all areas accessible to personnel with exposure rates greater than or equal to 2.5 mrem/hr shall be posted at each accessible perimeter with the words 'CAUTION - RADIATION AREA' and PPM 11.2.14.3, 'Storage of Radioactive Material' states in part that the storage area shall be posted at any accessible side with a "CAUTION - RADIOACTIVE MATERIAL" sign and that each container shall also be labeled with the "CAUTION - RADIOACTIVE MATERIAL" sign, the type of material and radiation levels at contact and three feet.

Contrary to the above requirements on May 30, 1985 the outdoor solidification work area was being used to store radioactive material and:

1. Three steel boxes containing compressed radioactive trash were not labeled at all regarding radioactive material content;
2. The storage area was not labeled at one accessible side in that the two barrier ropes on one side of the area were both down, the sign with the radioactive material posting was face down in sand and other postings were not readily apparent;
3. The area was not posted on any side as a radiation area and the measured radiation exposure rate at 18 inches from one container was 3.0 to 4.0 mr per hour.

The above conditions existed for about two hours prior to discovery by the NRC Inspector. The exceptions of 20.203 (f)(3) and 20.204 did not apply.

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

Validity of Violation

The Supply System concurs with the violation as stated.

Corrective Steps Taken/Results Achieved

- o The barrier was reestablished, containers were provided with proper labels and the area was correctly posted as a radiation area.
- o A review of the circumstances surrounding this occurrence was initiated and indicated this was a singular event rather than a programmatic breakdown.



The Health Physics (HP) Department employee responsible for these discrepancies was counselled on the necessity to follow Plant Procedures. The individual was also reinstructed on radioactive material and area labeling/posting requirements.

Corrective Steps To Be Taken

- o Additionally the radioactive material and area labeling/posting requirements will be reemphasized during a training cycle for Health Physics Technicians.

Date of Full Compliance

The plant is now in full compliance and a six week training cycle for Health Physics Technicians has commenced. This training cycle is scheduled for completion by August 16, 1985 and will reemphasize labeling and posting requirements.

- C. Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below: a. Regulatory Guide 1.33 ... g. Fire Protection Program Implementation". RG 1.33 Appendix A, Item 9.C lists examples of safety related equipment for which procedures should be prepared prior to beginning work.

PPM 1.3.18, 'Tool and Equipment Control Around Open Plant Systems' is identified by the licensee as a safety related procedure. This procedure, step 1.3.18.4.C states that use of this procedure is mandatory for components of the primary system when components are opened for rework. Step 1.3.18.7, Procedure, states that tools shall be inventoried and logged in and out of the work area and that all tools and equipment shall be equipped with a lanyard.

PPM 1.3.19, a licensee designated safety related procedure prohibits the use of clay mineral sorbants in the power block (reactor building, turbine building).

Contrary to the above:

1. On May 29, 1985, between 3PM and 5PM, work in progress on an open safety related portion of the primary system (inboard main feedwater check valve) was conducted without following procedure 1.3.18 in that tools were not logged, lanyarded or otherwise controlled.
2. On May 29 and May 30, 1985, the use of prohibited material (clay mineral absorbant) was observed on the 572 foot elevation of the reactor building.

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



Validity of Violation

The Inspector was correct in his findings concerning compliance with Plant Procedure 1.3.18 and 1.3.19. The cause of these instances of non-compliance was a fundamental lack of awareness of the procedural requirements by the personnel involved. This occurred because of minimal emphasis on these procedures during previous training.

Corrective Steps Taken/Results Achieved

- o As stated in the body of the inspection report ... "The Foreman took immediate steps to remove loose material from the vicinity of the work". In addition the Foreman initiated a "WNP-2 Tool and Equipment Inventory/Inspection Sheet". This inventory/inspection sheet was utilized for the remainder of the job resulting in the open system being "buttoned up" with assurance that system cleanliness had been maintained.
- o The clay mineral sorbent was removed from the Reactor Building. The sorbent was being used during operation of a pipethreader and crafts using the pipethreader were retrained on keeping sorbents out of the reactor building. This requirement was also clarified with all other crafts.
- o Plant Management has contacted the Support Service Contractor Management to ensure that this issue receives proper emphasis by all craft organizations.

Corrective Steps To Be Taken

- o Work instructions contained in Maintenance Work Request (MWR) packages are the Plant's primary method of implementing these types of procedural requirements. It is the Supply System's perception that engineers preparing the MWR work instructions have not fully incorporated these types of procedural requirements into the MWR. Therefore, a multi-organization committee has been instructed to evaluate the Plant procedure governing MWR preparation for possible improvements with regard to work instruction preparation guidelines.
- o Knowledgeable craft personnel working to MWR instructions are a second check for ensuring compliance with these procedural requirements. Therefore, all Plant Maintenance and Support Services Contractor craft personnel will be retrained in the requirements of PPM's 1.3.18 and 1.3.19.
- o Both subjects discussed in this violation are considered "skill of the craft" knowledge which is proceduralized (Volume 10.2 series procedures). Therefore, interfacing generic procedures (e.g., PPM 10.2.7, Valve Troubleshooting, Handling and Repairs) will be reviewed for adequate cross referencing of PPM's 1.3.18 and 1.3.19.



- o A plant procedure is currently being developed for control of chemicals in the plant. It is envisioned that this procedure will include an adequate control mechanism that will help preclude future violations of this nature.
- o The need for supervision to conduct more frequent Plant inspections during outages will be discussed during the "Lessons Learned" sessions to be held following completion of the current maintenance outage.

Date of Full Compliance

- o All identified actions will be completed by 9/1/85.

