

Washington Public Power Supply System

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September 5, 1985

Docket No. 50-397

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 85-22

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 7, 1985. Our reply pursuant to the provisions of Section 2.201, Title 10 Code of Federal Regulations, consists of this letter, Appendix A and Appendix B.

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.

In Appendix B, a discussion of the Plant's implementation of corrective actions and implementation of the fire protection program is provided.

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


G. C. Sorensen
Manager, Regulatory Programs

GCS:db

Enclosure

cc: Mr. W. S. Chin, BPA

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APPENDIX A

As a result of the inspection conducted June 10-14, June 25-28 and July 9, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violation was identified.

Paragraph 2.c(14) of the WNP-2 operating license states in part:

"Fire Protection Program, (Section 9.5.1, SER, SSER #3, SSER #4)

The licensee shall maintain in effect all provisions of the approved fire protection program".

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".

1. Administrative Procedure AP 1.3.10.7, which was in effect until June 26, 1985, stated in part:

"H. Equipment or spare parts shipped in untreated combustible packing/shipping containers may be unpacked in safety-related areas if required for operating/maintenance reasons. Normally this unpacking of untreated packing/shipping containers will not be done in safety-related areas. If it is necessary, a fire hazards review shall be done. All combustible materials shall be removed from the area immediately following the unpacking.

F. Flammable liquids in any safety-related area or area containing safe shutdown equipment shall be limited to 1 gallon of the flammable liquid contained in an approved safety container.

I. Temporary, portable ladders used with in the plant shall, in the interest of mitigating flame spread, be constructed of fiberglass; except that step ladders, less than 9 feet in length, may be of wooden construction".

Contrary to the above requirements:

- a. Two cardboard boxes containing air filters were located on the 525' elevation of the Radwaste Building, on June 12, 13 and 26, 1985. These items were also identified by the licensee during an inspection on May 10, 1985.

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- b. Small plastic bottles (not "approved safety containers") containing Acetone, a flammable liquid, were observed in the "B" Diesel Generator Room and on the 525' elevation of the Radwaste Building on June 13 and 26, 1985. The bottle in the Diesel Generator Room had been identified by the licensee during an inspection on June 5, 1985.
 - c. A wood extension ladder about 15' long (unextended) was located and apparently stored inside of the Radwaste Building on June 14 and June 26, 1985.
2. Administrative Procedure 1.3.35 which became effective June 26, 1985, stated in part:

"1.3.35.6 Flammable or Combustibles Procedures

- A. Storage of combustible materials, combustible and flammable liquids and flammable gases, high efficiency particulate air and charcoal filters, dry ion exchange resins, aerosol containers, or other combustible supplies shall be controlled in the following manner:

Combustible liquids in 5 gallon containers or less must be removed or put into storage.

- a. At end of job or
- b. At end of shift if job is not continuous between consecutive shifts.

Aerosol Containers

- 1. Alcohol and Petroleum base or flammable contents.
 - a. Kept at work site in limited quantity.
 - b. Removal at end of job or shift.

Combustible Materials - Vital Area

- 1. All combustibles that can be eliminated as part of the work process should be. This would include the removal of packaging materials, boxes, wrapping, etc.
- 2. Combustibles that enter the vital area should be removed at the end of the job or shift if work is not continuous between consecutive shifts.

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3. When removal is not possible, a Transient Combustible Permit is required". (This paragraph also required this permit to be located in the area of the combustible materials.)

Contrary to the above requirement, on June 27, 1985, with no work in progress in the described areas the following conditions existed.

- a. Aerosol containers with flammable contents had not been removed at the end of a shift in that, aerosol cans of a cleaning agent "Conq-R-Dust" labeled as "flammable" had been left unattended in the Reactor Building on the 606' (2 cans), the 571' (1 can) and the 548' (2 cans) elevations.
- b. Combustibles in a vital area had not been removed in that on the 501' elevation of the Reactor Building, several plywood (apparently untreated) and cardboard boxes, about two gallons of oil in a polyethylene jug and a pile of yellow plastic, were located near the containment entry on June 26 and 27, 1985. No Transient Combustible Permit was located in the area.
- c. Combustibles in a vital area had not been removed in that sixteen large plastic drums were located on the 501' elevation of the Reactor Building to be used for collecting liquid from the Standby Liquid Control System. No Transient Combustible Permit was located in the area.
- d. Combustibles in a vital area had not been removed in that four open cabinets full of anti-contamination clothing and other combustible materials were being stored on each of the 471', 501', 522' and 548' elevations and three open cabinets were stored on the 571' elevation of the Reactor Building. In addition, on the 548' elevation were eleven large polyethylene bags and on the 501' elevation were seven cardboard boxes of clothing. No Transient Combustible Permit was located in the area. Previous licensee analysis showed the amounts in the cabinets exceeded that which could safely be stored in the respective areas. This is a repeat of a violation issued on March 19, 1985.

This is a Severity Level IV Violation (Supplement I)

Validity of Violation

The Supply System concurs with the validity of this violation. The steps taken to correct specific areas of concern are included in Corrective Actions.

Corrective Actions

Item 1:

- a. Both cardboard boxes located on 525' elevation of the Radwaste Building on June 12, 13 and 26, 1985 were removed.
- b. The small plastic bottles of acetone were removed from the "B" Diesel Generator Room and the 525' elevation of the Radwaste Building.
- c. The wooden extension ladder was removed from the Plant on June 26, 1985.

Item 2:

- a. Plant Laborers have conducted a tour of the entire Plant and have removed aerosol cans whose contents are labeled as "flammable" as well as cans whose contents failed to state that they are "non-flammable". Additionally, aerosol cans containing flammable liquids will be removed from vital Plant areas at job completion or at the end of the shift if the job is not continuous.
- b. The combustibles were removed from the 501' elevation and from the Plant. It should be noted, however, that these combustibles were an accumulation of material due to a major cleanup at the termination of the recent Maintenance Outage and, as such, had been accumulated from diverse locations within containment and the 501' elevation of the Reactor Building. PPM 1.3.35, Rev. 0 with the new requirement for a Transient Combustible Permit, had just been approved on the same day as the NRC inspection.
- c. The large plastic drums located on the 501' elevation of the Reactor Building have been removed. Metal drums will be used for this purpose in the future.
- d. The anti-contamination clothing has been reduced to the amount delineated on the analysis performed by Industrial Safety and Fire Protection. The anti-contamination clothing on the 501' elevation is now contained in two metal enclosed cabinets.

Date of Full Compliance

The Supply System is now in full compliance with the delineated violations.



APPENDIX B

The Supply System was requested in the cover letter of NRC Inspection Report 85-22 to respond to concerns of . . .

"Apparent lack of management attention to the implementation of effective corrective actions and your apparent failure to apply sufficient attention to the area of fire protection program implementation".

Response

It is the Supply System's position that the NRC's concern, as stated, does not reflect the actions in progress by Plant Management prior to and during the inspection period. The need for improvements in the area of housekeeping/fire protection has been identified by management and programmatic improvements have been and are continuing to be developed utilizing input from both Plant Staff as well as Fire Protection Specialists.

The concerns addressed by the NRC stem from a lack of adequate interim corrective action by the Plant Staff while formalizing the program upgrade. The importance of interim corrective action has since been stressed by the Plant Manager to the Staff.

The WNP-2 Plant Management will continue to focus on the programmatic aspects of problems in order to provide lasting solutions to any problem. In addition, the Staff will be more sensitive to interim corrective actions until program changes are implemented.

