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

Docket No. 50-397
September 18, 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 85-29 EXIT
INTERVIEW COMMITMENTS

The Washington Public Power Supply System hereby replies to concerns expressed by your staff during the NRC Inspection 85-29 exit meeting of August 21, 1985. Our reply pursuant to verbal commitment made consists of this letter and Appendix A (attached).

In Appendix A, a statement of the concern with background comments is presented and the commitment, as we understand it, is stated.

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

G.C. Sorensen
Manager, Regulatory Programs

GSC/la
Attachment

IE-01

APPENDIX A

During an NRC inspection exit meeting conducted on August 21, 1985, areas of concern were identified. These concerns involved requalification training for HP/Chem Technicians and the Radioactive Waste Management and Transportation Program. In accordance with the agreement made, the commitments resulting from the concerns are listed below:

A. Concern

The WNP-2 Radioactive Waste Management and Transportation program should be reviewed to provide additional assurance of regulatory compliance.

Response

- o WNP-2 will review its radioactive waste management program and process control program for compliance to 10CFR61 and 10CFR71 with emphasis in the areas of quality assurance and quality control and will make appropriate procedural changes by 11/1/85.

- o WNP-2 will not ship quantities of Type B radioactive materials until the above mentioned review and procedural changes are completed.

B. Concern

The first cycle of the two year requalification program for Health Physics and Chemistry Technicians should be completed by December, 1985 (two years following licensing). The current schedule at WNP-2 indicates completion by March 1986, two years after implementation of the program.

Background

The plant has experienced delays in the implementation of our requalification program. Some important factors creating these delays include labor relations concerns and Plant startup manpower needs. While the program is an ambitious one, we are not willing at this time to reduce it either in scope or in depth. We have choosen instead to provide additional flexibility in the schedule of requalification cycles to more effectively allow for manpower needs associated with Plant evolutions.

Response

- o Commensurate with the scheduling flexibility recently developed in the Supply System Health Physics Program Description (HPD 3.1.20), the requalification program will be revised to reflect the following:

  - Each journeyman health physics and chemistry technician will complete the requalification training program within a two year time interval with:

APPENDIX A

a. A maximum allowable extension not to exceed 25% of the requalification interval, but

b. The combined time interval for any three consecutive requalification intervals shall not exceed 3.25 times the two year interval.

C. Concern

As a result of NRC Inspection 85-20 conducted on May 29-31, 1985, a Notice of Violation response was issued July 11, 1985. Appendix A page 3 of 5 Date of Full Compliance contains a statement concerning the modification of the Health Physics Technician training curriculum to reflect increased emphasis on radioactive material and area labeling/posting requirements. The statement indicated that the increased training was scheduled to be completed by August 16, 1985. The training of all personnel was not completed on August 21, 1985 the date of the exit.

Response

The additional training committed to in the response to Inspection Report 85-20 was not completed on August 16, 1985. This training was completed on August 27, 1985.