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Washington Public Power Supply System

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REGION V INE

October 18, 1985
G02-85-733

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 85-30

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 20, 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 our position regarding the validity of the violation, 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
Attachment

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During an NRC inspection conducted on August 3-31, 1985, a violation of NRC requirements was identified. The violation involved use of operating procedures while controlling suppression pool level. The following has been excerpted from the Notice of Violation:

Technical Specifications Section 6.8.1 requires that "Written procedures shall be established, implemented, and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978". Included in the list of procedures recommended by RG 1.33 are: "4. Instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operations...for the ...e. Shutdown Cooling and Reactor Vessel Head Spray System, h. Emergency Core Cooling System, and j. Containment". and "5. Procedures for Abnormal, Offnormal, or Alarm Conditions".

The RHR system operating procedure PPM-2.4.2 Section E, Residual Heat Removal System Suppression Pool Discharge to Radwaste, Step 3) requires the operator to "Start RHR pump RHR-P-2B" prior to discharge to Radwaste.

The annunciator response sheet *4.601.A12-2.3 refers to emergency procedure PPM 5.2.4 Suppression Pool Level Control Step 3.1 or 3.2 to maintain suppression pool level within the desired limit. The applicable Step 3.1 requires the operator to:

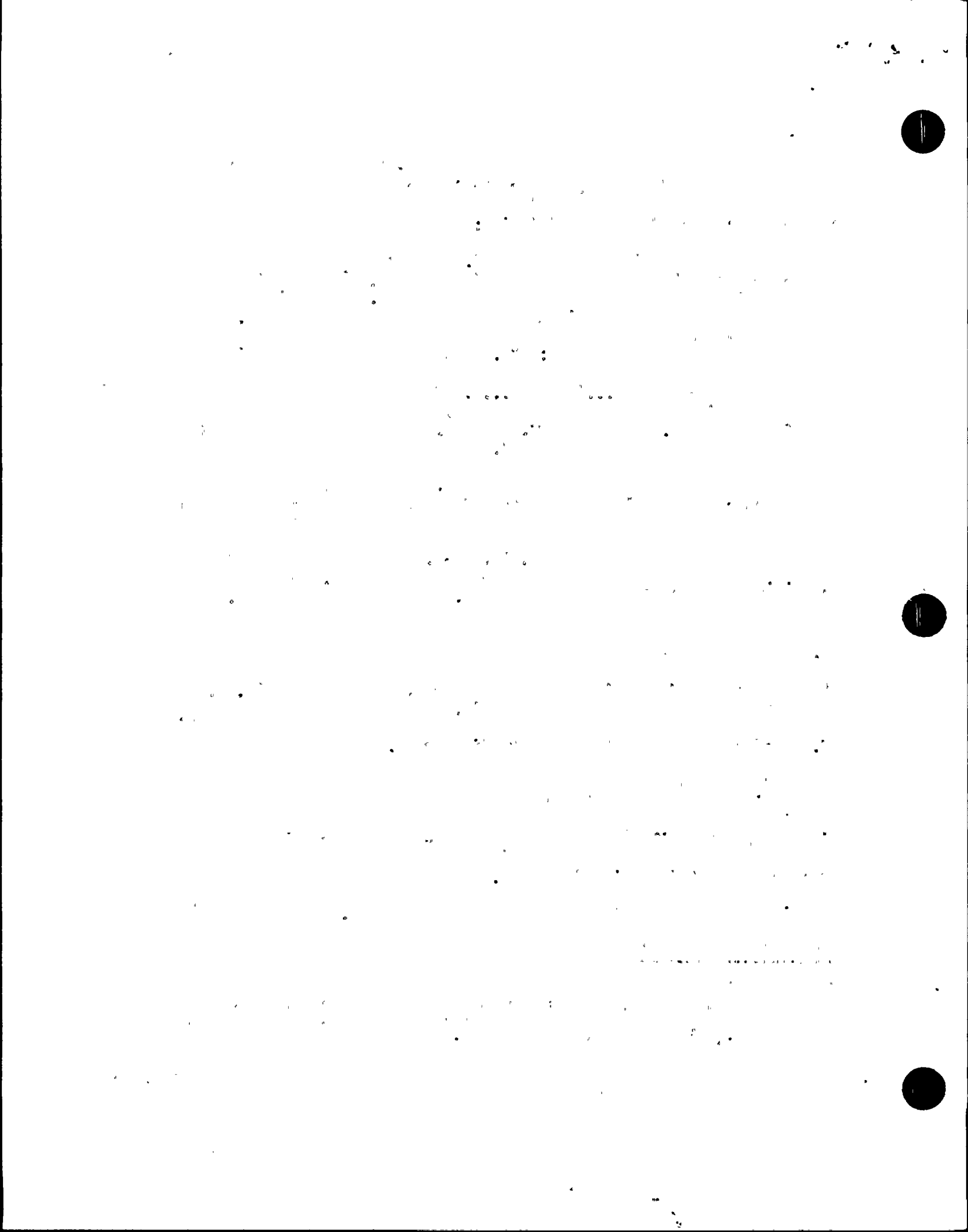
- "a. Operate RHR-P-2B (RHR Loop B Main Pump).
- b. Request the HP/Chemist sample RHR Loop B. Refer to PPM 12.10.1, Post Post Accident Sampling and Analysis.
- d. Confirm sample results prior to discharge".

Contrary to the above, on August 23, 1985, the control room staff discharged suppression pool water to the radwaste system without operating pump RHR-P-2B and without obtaining a water sample and confirming sample results prior to discharge. The failure to operate pump RHR-P-2B led to a low pressure condition and potential or actual voids in the reactor injection line from this low pressure coolant injection ECCS pump.

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

VALIDITY OF VIOLATION

This violation response is divided into two parts. Item A addresses the failure to operate RHR-P-2B while discharging suppression pool water to the radwaste system. Item B addresses obtaining a suppression pool water sample and confirming sample results prior to discharge.



Item A The Supply System acknowledges the validity of this portion of the violation. The requirements of the plant procedures were not followed, however, the results of this evolution had no deleterious effects on the RHR system operability. A procedure deviation should have been processed to allow the use of this alternate method of water transfer.

As cited, RHR-P-2B was not operated during discharge of suppression pool water to the radwaste system as required by the system operating procedure PPM 2.4.2. Instead, the operating crew used an alternate method via the RHR loop keep-filled pump (RHR-P-3), which operates continuously.

Although the annunciator for RHR B pump discharge pressure hi/low did activate indicating 11.3 psig at the system high point, the control room operator demonstrated to the inspector that he could clear the alarm by minimal throttling of RHR-V-40. Therefore the pressure at the high point of the system was sufficient to prevent the formation of voids. To confirm this, after the evolution, RHR Loop B was verified to be filled by performing the venting requirements of Technical Specification Surveillance Procedure 7.4.5.1.1.

The decision to use this alternate method of transferring water was based on the desire to preclude the daily starting and wear on an ECCS pump.

CORRECTIVE STEPS TAKEN/RESULTS ACHIEVED

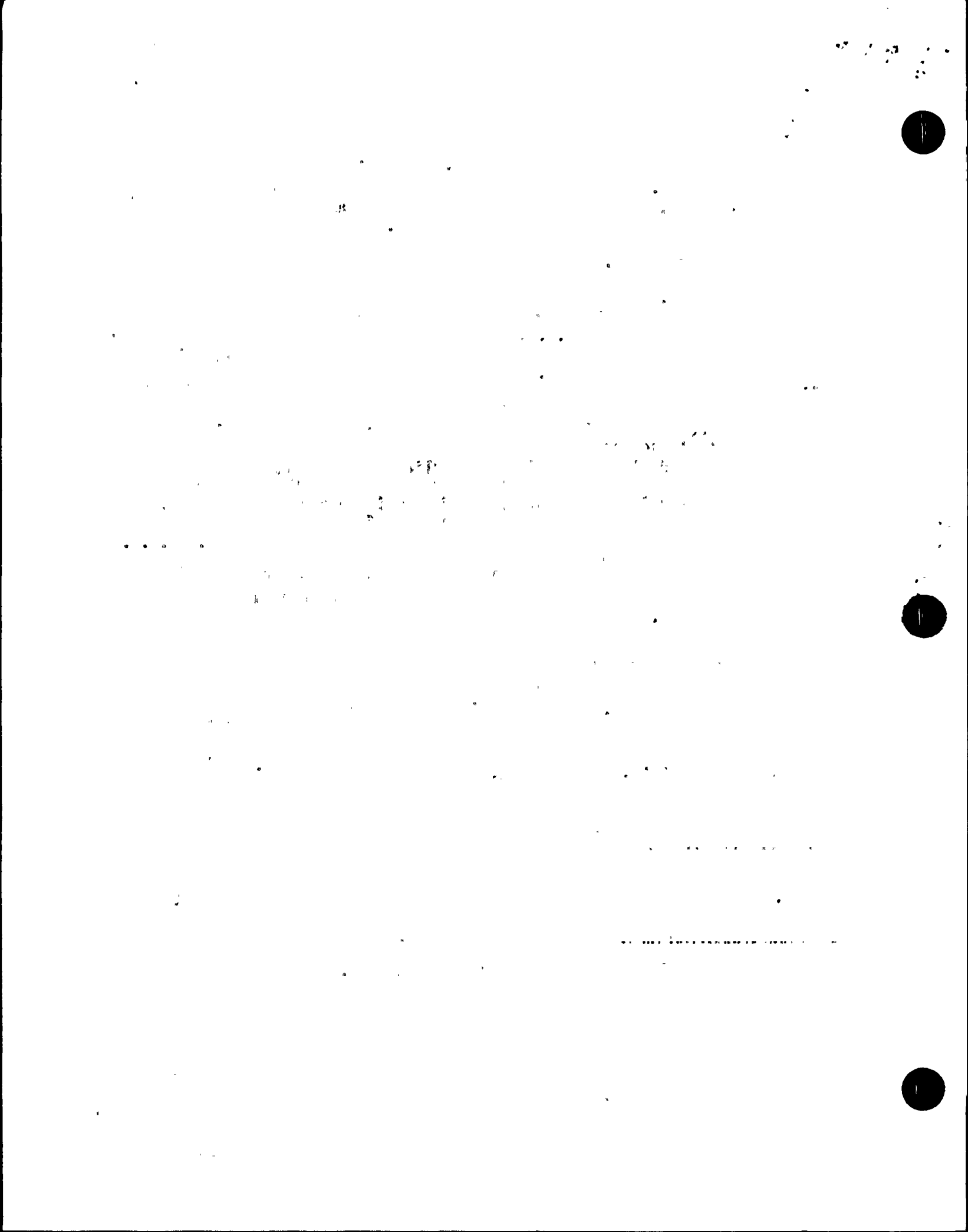
The WNP-2 Plant Management has reiterated to the operating crew the necessity to follow procedures and, when appropriate, to provide justified changes to operating procedures using the methods provided in the Plant Administrative Procedures. All licensed operators were instructed via Night Orders to use RHR-P-2B per PPM 2.4.2 when pumping down the suppression pool. This method is planned to be used until a modification is implemented which will allow suppression pool pump down via the suppression pool cleanup pump.

CORRECTIVE ACTIONS TO BE TAKEN

This NOV response will be required reading for all licensed operations personnel.

DATE OF FULL COMPLIANCE

Required reading will be completed November 15, 1985.



APPENDIX A

Appendix A
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Item B

The Supply System does not consider this portion of the violation valid. PPM 12.10.1, Post Accident Sampling and Analysis was not applicable to this event. The entry condition for PPM 5.2.4, Emergency Procedures Suppression Pool Level Control (SP/L) requires suppression pool level greater than 31 ft. 1-3/4 in. During the event, the maximum level to be reached was 31 ft. 0 in. Therefore there was no requirement for entry into PPM 5.2.4 which references the use of PPM 12.10.1 and consequently, no requirement to sample suppression pool water (RHR Loop B) or confirm the results prior to discharge to radwaste.

