



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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REGION V I&E

August 22, 1986
G02-86-822

Docket No. 50-397

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 86-21

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated July 25, 1986. 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

GSC/lc

Attachment

cc: JO Bradfute - NRC
E Revell - BPA
NS Reynolds - BLCP&R
NRC Site Inspector

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APPENDIX A

During an NRC inspection conducted June 1 - July 12, 1986, two violations of NRC requirements were identified. The following has been excerpted from the Notice of Violation:

- "I. T. S. 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 Regulatory Guide 1.3.3, [sic 1.33] Rev. 2, February 1978."

WNP-2 Administrative Procedure 1.3.18., Tool and Equipment Accountability Around Open Plant Systems, states:

"This procedure is to minimize introduction of foreign matter into clean systems or components of the primary loop or ECCS systems by establishing an accountability handling system for tools and small equipment used in or near (close enough to drop in) an open system or component."

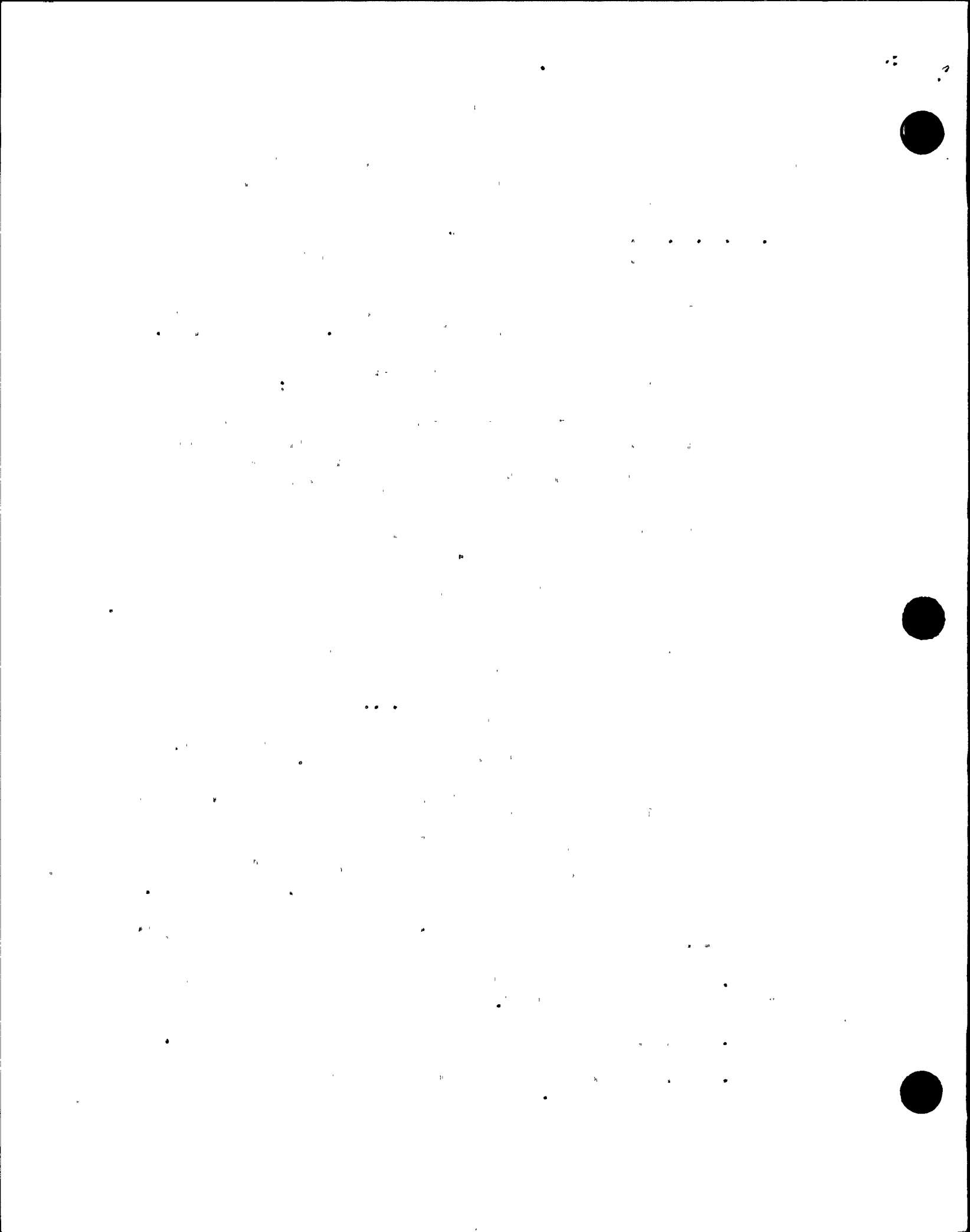
- "NOTE: (1) Applies to work in or near an open system or component.
- (2) Every individual who enters a work area near or in an open systems or component shall sign log.

"All tools and equipment to be used during the performance of maintenance, testing, inspection or operational functions shall be inventoried and listed on a Tool and Equipment Inventory Sheet (similar to the attached)....As each tool or piece of equipment is carried into and removed from the work area boundary, entries shall be made in the appropriate columns by the individual transporting the equipment.

"All tools and equipment shall be equipped with a lanyard of sufficient tensile strength to withstand the shock of the dropped weight of the object. The bitter end of the lanyard shall be securely fastened to the operator using the tool or equipment or, in case of heavy equipment, to a structure capable of supporting the dropped weight of the equipment."

Contrary to the above, on June 27, 1986, while performing repairs on RHR-V-53B:

1. Tools and equipment used during the performance of maintenance were not inventoried.
2. A Tool and Equipment Inventory Sheet was not maintained.
3. A log was not being maintained for personnel working near or on the open system.



4. When working on the valve with the RHR system open, securing lanyards for tools were not used.

This is a Severity Level IV Violation (Supplement 1).

- II. T. S. 6.11.1. states "Procedures for personnel radiation protection shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

WNP-2 Administrative Procedure 1.3.7, Maintenance Work Requests, states in part in paragraph 7.A.46 that "Assigned personnel will familiarize themselves with the requirements of the... RWP... prior to commencing work."

Plant Procedure 11.2.8.1, Radiation Work Permits, states in paragraph 4 that "The job supervisor or designee shall sign, date, and list telephone extension number signifying the acceptance of the RWP requirements."

Radiation Work Permit (RWP) 286-00-280 established the following health physics and contamination control requirements for work on RHR-V-53B:

"(a) Continuous HP coverage during system breach, grinding, welding, machining and wire brushing of contaminated components.

"(b) Eye shields for beta protection when not wearing a respirator."

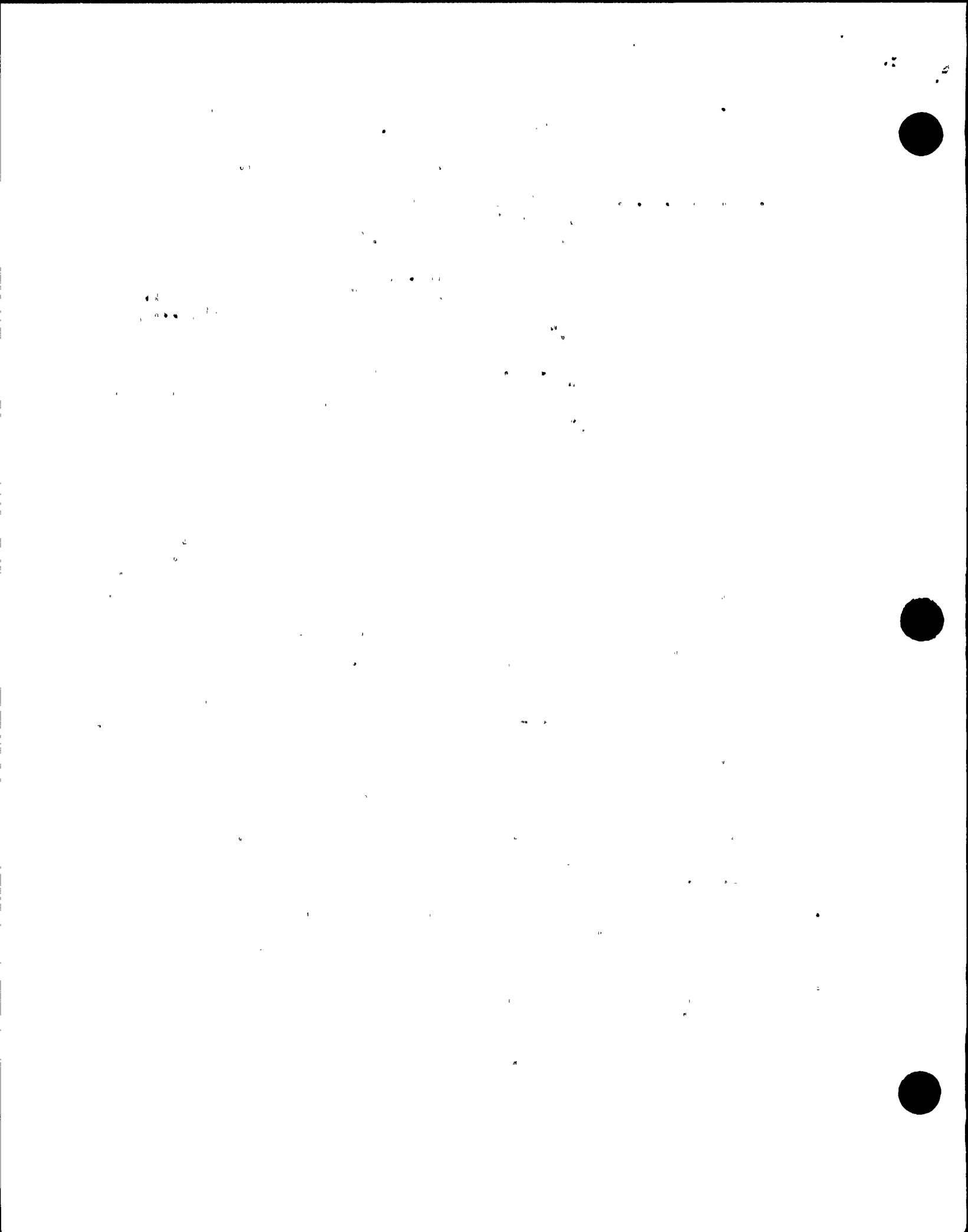
Contrary to the requirements of the RWP, on June 27, 1986, while licensing [sic licensee] personnel were performing work on the residual heat removal system (RHR-V-53B):

1. With the RHR system open and grinding of the valve seat in progress on RHR-V-53B, continuous HP coverage was not provided.
2. Neither face shields nor respirators were worn by the craftsmen when the RHR system was open and maintenance was being conducted on the valve seat in RHR-V-53B.

This is a Severity Level IV Violation (Supplement 1)."

Validity of Violation

1. The Supply System acknowledges the validity of Violation I concerning tool accountability. We do not entirely agree with Violation II concerning Health Physics requirements during the RHR-V-53B repair effort.
2. Violation II.1 states "Contrary to the requirements of the RWP, on June 27, 1986, while licensing [sic licensee] personnel were performing work on the residual heat removal system (RHR-V-53B): 1. With the RHR system open and grinding of the valve seat in progress on RHR-V-53B, continuous HP coverage was not provided."



It was the interpretation of Health Physics personnel that the RWP did not require continuous HP coverage during the activity in progress, but only during periods of system breach when "grinding, welding, machining and wire brushing of contaminated components" was in progress. The activity observed by the NRC inspector was the wet lapping of the RHR-V-53B valve seat. This activity had been previously evaluated by HP as being neither grinding, machining, nor other activity which would create a Health Physics concern. The decision was made not to require continuous HP coverage during wet valve lapping. Had the RWP been revised to clarify the HP requirements to specifically address wet lapping, HP requirements would have been more visible to observers of the valve repair and probably would have added to the efficiency of the overall repair effort. The Supply System does not feel, however, that a violation of the RWP requirements occurred due to this event.

3. The Supply System acknowledges the validity of the violation designated II.2.

Corrective Steps Taken/Results Achieved

1. Violation I - The supervisory personnel involved were counselled concerning compliance with procedures and reinstructed on the requirements of PPM 1.3.18, "Tool and Equipment Accountability Around Open Plant Systems."
2. Violation I - The mechanical maintenance group has been reinstructed via a series of shop meetings on the requirements of PPM 1.3.18, "Tool and Equipment Accountability Around Open Plant Systems."

Corrective Action To Be Taken

1. Violation I - All mechanical maintenance personnel will reread the revised PPM 1.3.18.
2. Violation I - PPM 1.3.18 will be modified to improve its capability to be used effectively in the plant.
3. Violation I - Compliance to tool control requirements will be discussed in a letter to the station staff addressing management expectations in this area.
4. Violation II - Management expectations will be communicated to the staff via a letter which address generic compliance with Health Physics requirements and specifically addresses implementation of Radiation Work Permits (RWP).
5. Violation II - Specific training will be provided to Health Physics personnel concerning the composition of and implementation of RWPs.

Date of Full Compliance

1. Violation I
 - A. Full compliance with the tool control provisions of PPM 1.3.18 was achieved by June 28, 1986, prior to reassembly of RHR-V-53B.



- B. Reinstruction of mechanical group personnel concerning PPM 1.3.18 compliance was completed by July 29, 1986.
- C. The management expectations letter concerning tool control requirements will be issued by September 30, 1986.
- D. Required reading of revised PPM 1.3.18 will be completed by September 30, 1986.
- E. PPM 1.3.18 will be modified by August 27, 1986.

2. Violation II

- A . Station personnel will receive additional training on RWPs by September 30, 1986.
- B. The management expectations letter concerning RWPs will be issued by September 30, 1986.

