



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

October 20, 1986
G02-86-960

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 86-31

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 18, 1986. Our reply pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendices A and B (attached).

In Appendix A, an explanation of our position regarding the validity of the violation is provided. Appendix B summarizes our presentation at the Enforcement Conference and describes our commitment to management involvement and follow-up on proposed corrective actions.

It should be noted that our response was due to be sent to the NRC by October 18, 1986. However, as a result of last-minute internal questions arising from our response to control of measuring and test equipment, I decided to further investigate these questions prior to issuing this letter. A three-day extension for issuing our response was discussed with Phil Johnson, Chief, Reactor Projects, Section 3.

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

for R. B. Sorensen
G. C. Sorensen
Manager, Regulatory Programs

GCS:mm

Enclosures

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APPENDIX A

I. As a result of the inspection conducted on June 16-27, 1986 (Inspection Report No. 86-11), and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) the following violations were identified:

A. 10 CFR 50 Appendix B, Criterion V states, in part, that:
"Activities affecting quality shall be prescribed by documented instructions, procedures or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings." Further, Section 5.2.1 of WNP-2's Operation Quality Assurance Program Description Manual, states, "Activities that affect safety-related functions of plant items shall be described by and accomplished through implementation of documented procedures, instructions or drawings as appropriate."

1-a. Step 1)a. of Procedure No. 7.4.8.2.1.10, 60 Month Battery Testing of E-B1-HPCS, requires that the test coordinator "Verify all prerequisites have been read and understood and these prerequisites have been met."

Contrary to the above, during the retest of the HPCS battery on May 25, 1986 the prerequisites were not verified.

1-b. Section 1.5.1.3.E of procedure 1.5.1, Technical Specification Surveillance Testing Program, states, regarding test instruments used in the conduct of surveillance tests: "The manufacturer's model number, name and range (if applicable) shall be recorded, as well as, calibration void date as applicable."

Contrary to the above, on May 25, 1986, the calibrated instruments used during the retest of surveillance procedure number 7.4.8.2.10, 60 Month Battery Testing of the E-B1-HPCS, were not identified in the record.

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

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

1. The reviewer and performers of PPM 7.4.8.2.1.10 were counseled with regard to the importance of reperforming prerequisites when an unfinished surveillance has been delayed.

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2. The calibrated instruments used during the retest of E-B1-HPCS have been identified in the record.

Corrective Action to be Taken

1. Electrical Maintenance personnel will be counseled on the importance of recording calibrated instruments on test records.
2. Administrative Procedure PPM 1.5.1, "Technical Specification Surveillance Testing Program," will be appropriately revised to explain the process when a surveillance procedure has been significantly delayed.

Date of Full Compliance

1. Corrective action for item one will be completed by November 7, 1986.
 2. Corrective action for item two will be completed by December 1, 1986.
- 2-a. WNP-2 Administrative Procedure 1.5.4, Section 2 states, in part, "This procedure establishes responsibilities and methods for the control and calibration of all M&TE used by plant personnel and other groups or contractors who may be issued such equipment."

Contrary to the above, at the time of this inspection, the records pertaining to the following three items indicated the tools were in the tool crib, when, in fact, the tools were not in the crib.

- a) Master List Item No. 40377, O.D. Micrometer(s)
- b) Master List Item No. 42477, Oxygen Analyzer
- c) Master List Item No. 39366, Pyrometer

- 2-b. WNP-2 Administrative Procedure 1.5.4, Section 5.E.8 states, in part:

"Return M&TE to the M&TE Tool Crib in less than or equal to seven days from time of checkout

or

when need exceeds seven days, the person using the M&TE will return to the M&TE Tool Crib and sign it out for another seven days."

"NOTE: This may be repeated until the calibration cycle is expired."

Contrary to the above:

- (1) Torque wrench EQ 262 was checked out of the tool crib on April 30, 1986 and checked in on June 2, 1986 without any interim recorded history to demonstrate that the seven day rule was satisfied.
- (2) Torque wrench EQ 265 was checked out of the tool crib on May 3, 1986 and checked in on June 6, 1986 without any interim recorded history to demonstrate that the seven day rule was satisfied.

2-c. WNP-2 Administrative Procedure 1.5.4, Section 7.B.1 states in part, "All M&TE shall have a Supply System identification number permanently attached. Some equipment due to their size and/or usage will not have a Supply System ID number or tag, these items shall be etched or otherwise permanently marked."

Section 7.B.4 states in part, "The Supply System identification number and the noun name of the piece of M&TE shall be entered into the computer listing of all Plant M&TE."

Contrary to the above:

At the time of the inspection 62 crimping tools were found in the plant which had not been identified with a calibration code number nor recorded on the M&TE master list.

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

Validity of Violation:

The Supply System acknowledges the validity of this violation in that 1) certain items were not in the tool crib as indicated by records, and 2) certain items were checked out for more than seven days. However, clarification of item 2-c (crimping tool control issue) appears necessary and is presented as follows:

1. Crimping tools previously were not identified as measurement and test equipment. They were controlled by PPM 10.25.45 "Crimping Tool Control and Calibration," not by PPM 1.5.4 "Control of Measurement and Test Equipment." In March it was determined that crimping tools should be subject to the same level of control as M&TE. Crimping tools were collected, tagged and removed from the plant to the Standards Laboratory for insertion into the M&TE control system. That action was completed on March 26, 1986.
2. Crimping tool control was formally transferred (for program consistency) to the M&TE system on May 5, 1986 with revision of PPM 1.5.4 and cancellation of PPM 10.25.45.

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3. At the time of the inspection (June 16-27) the in-plant inventory of crimping tools stood at approximately 12 under full control of the M&TE system.

Corrective Steps Taken/Results Achieved

1. M&TE users have been made aware of the importance of properly documenting M&TE check out and return. Additional instructions have been posted at the tool crib and PPM 1.5.4 "Measurement and Test Equipment Control" has been revised to include actions to be taken by M&TE users when the tool crib is unattended.

Random inventories of M&TE tool crib contents using M&TE records indicate that these steps have been effective.

2. These incidents occurred during a period of transition from two control and records systems to a single system. The transition to the single system has been completed, including a computer tracking system which flags items not returned or re-signed out within seven days.

Corrective Action to be Taken

Arrangements have been made to provide dedicated, full-time M&TE tool room staffing.

Date of Full Compliance

Corrective action will be completed by October 18, 1986.

3. Plant Procedure Manual (PPM) 1.3.7 states "The Maintenance Work Request (MWR) shall be used to control all corrective maintenance activities...." Step 1.3.7.7.A of the procedure requires that "the smallest piece of plant equipment that requires the work be used to identify what is worked on."

This procedure also states that the maintenance section supervisor "Reviews and ensures that MWR and any supporting documentation is completed.... Signs 'Reviewed by' block of work section and indicates that the work has been accurately and completely performed in compliance with applicable plant procedures."

Contrary to the above, on May 31, 1986, MWR #AU3181, issued on February 7, 1986 for RHR-MO-6B, was "continued" after the work section supervisor had reviewed and approved the completed MWR; however, work was performed under MWR #AU3181 on another valve (RHR-V-27B) and the "continued" MWR was not reviewed by the Maintenance Section Supervisor for the additional work.

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



Validity of Violation

The Supply System acknowledges the validity of this violation. During the operability check of the MWR in question, a continuation sheet was added and work was completed on a different valve. This added work was not reviewed because the continuation sheet was not routed to the Maintenance Supervisor. This was in violation of existing PPM requirements.

Corrective Steps Taken/Results Achieved

1. MWR work instruction guidelines have been issued.
2. Added MWR review within Maintenance disciplines has been initiated.

Corrective Action to be Taken

Documented in-house training is ongoing; stressing the responsibilities and requirements for returning MWRs for added/changed work scope.

Date of Full Compliance

January 1, 1987.

- 4-a. Section 2.B of Plant Procedure Manual 10.20.10, Rev. 1 entitled "Diesel Air Start Motor Maintenance," reads, "Data Sheet 1 must be filled out for rebuilt air motors. Several steps require an independent check and signature."

Contrary to the above, subsequent to April 26, 1986, four (4) air start motors (Serial Nos. 119197, RBJ 06581, RTM 31854 and 116294) to be used on the emergency diesel generators were rebuilt as prescribed on Maintenance Work Request AU3423. No independent checks or inspections were performed by Quality Control personnel. Also, no signatures were on the associated maintenance documents to show that independent checks had been performed.

- 4-b. Step 7.C.16 of Plant Procedure Manual 10.20.10, Rev. 1, entitled, "Diesel Air Start Motor Maintenance," states, "Use a inside micrometer to measure the bore of the cylinder. If the bore exceeds 3.460 inches replace the cylinder."

Contrary to the above, on January 16, 1986 during rebuilding of air start motor RHB 07334, the cylinder bore was not measured.

This is Severity Level IV Violation (Supplement I).

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Validity of Violation

The Supply System acknowledges the validity of this violation in that Section 10.20.10.2.B of PPM 10.20.10 had not been revised to reflect deleted independent sign-offs from Data Sheet 1.

Corrective Steps Taken/Results Achieved

1. PPM 10.20.10, "Diesel Air Start Motor Maintenance" was revised on 12/13/85 and deleted independent sign-offs from Data Sheet 1. Section 10.20.10.2.B was not revised to reflect removal of these sign-offs. Of the twenty-four (24) air start motors rebuilt under Maintenance Work Request (MWR) AU3423, twenty (20) or 83% were independently inspected by Plant Quality Control with no problems noted during any of the inspections.

Section 10.20.10.2.B of PPM 10.20.10 has been revised to delete reference to independent signatures on Data Sheet 1.

2. The air start motor in question was a new motor. During testing before installation, Maintenance personnel discovered an air leak around the covers. Accordingly, the gaskets were replaced and the motor tested satisfactorily. Being a new motor, there was no reason to disassemble the cylinder bore; therefore, the diameter was not measured. It should be noted that Plant QC witnessed work associated with the rebuilding of Air Start Motor RHB 07334 (Reference QC Inspection Planning Report No. 85-721).

Corrective Action to be Taken

None

Date of Full Compliance

N/A

5. Plant Procedure 10.25.19, Revision 2, "Termination and Splicing Instruction," sets forth the procedures for terminating electrical cables. Section 9, Paragraph A.2.c of this procedure states, "Prior to terminating the conductor(s), the electrician shall install lugs/connector on both the 'to' and 'from' ends of the conductor(s) and verify conductor(s) integrity by performing a continuity check." The procedure also states that if continuity results are satisfactory, the electrician shall sign and date the "Wire Termination List" in the block identified as "Continuity Test". Paragraph A.2.d of this section states,



"The electrician shall complete the directions called out on the 'Wire Termination List' or the 'Interconnect Termination Instructions' as applicable, for each conductor. When the modification has been made, the electrician shall sign and date the 'Wire Termination List' and/or the 'Interconnect Termination Instructions.'"

Contrary to the above, on February 5, 1986, the electrician performing the work on the Emergency Diesel Generators excitation circuit motor-operated potentiometer pursuant to Maintenance Work Request AW 6886, did not sign or date the Wire Termination List and/or the Interconnect Termination Instructions.

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

Validity of Violation

The Supply System acknowledges the validity of this violation in that this was a procedural-type problem. All required data was included; the only problem was that no form was included with the package.

Corrective Steps Taken/Results Achieved

The proper form was obtained, the information was recorded on the form and the form was filed with the MWR package.

Corrective Action to be Taken

None

Date of Full Compliance

N/A

6. Administration Procedure 1.3.19, Housekeeping, Section 2, "Individuals Responsibilities," reads, in part, "Each employee will perform the following at the end of each assignment or at the end of the work day if assignment is not complete."
 - "a. Wipe up minor oil spills, pick up rags, papers and other foreign material....
 - "b. At the end of the job, return all tools and equipment used to assigned storage locations....
 - "f. Control panels and all escutcheons, engravings, etc. are to be inspected weekly and cleaned as needed by operator on duty."

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Contrary to the above requirements, at the time of the inspection, foreign materials were located in the areas described below and no work assignments were in progress.

- o wrenches and hand saw in Room 213
- o rubber glove in RHR pump 2A sump
- o debris in pit under RHR pump 2B
- o paper blocking metal bar screen on drain under RHR pump 2C
- o cigarette butts and package in RHR pump 2C room
- o Bisco foam on floor near open drain in RHR pump 2C room

The following materials were also found loose inside control room panels 601, 602 and 603:

- o electrical crimping lugs
- o one replacement electronic module
- o jumper cabling (unused)
- o approximately one dozen metal plates (covers for electrical equipment)
- o plastic cable tray covers
- o approximately thirty loose screws
- o three metal annunciator back guards
- o electrical solder
- o fuse identifiers
- o two electronic isolators
- o phone jack
- o electrical lamps (replacement bulbs)
- o fuses
- o a two-foot copper ground wire, fastened at one end

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

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

Administrative procedure PPM 1.3.19 "Housekeeping" is in the process of extensive revision and will implement new guidelines for inspections and corrective actions. In part, the Plant is implementing the Floor/Area Coordinator concept. The coordinator's responsibilities will be to ensure compliance with PPM 1.3.19, Appendix R "Fire Protection," storage of combustibles, degradation of Plant equipment and structures, and any other general housekeeping items. These inspections will be on a frequent basis with corrective action by the organization responsible and followup to the coordinator.

In the interim, other actions implemented are department shop meetings on the requirements of PPM 1.3.19, and sensitivity sessions with the craftsmen on the referenced violation. We have increased our temporary laborer staff to implement a program of "cleaning under the carpet", and "getting in the corners."

Employees have been instructed to the requirements for storing equipment and materials in the Plant. A complete and documented survey was performed on all safety-related panels throughout the Plant and in the auxiliary buildings. Materials found loose in the Control Room panels and other panels throughout the Plant have been removed and placed in proper storage.

Corrective Action to be Taken

1. Administrative Procedure PPM 1.3.19 is in the process of being revised.
2. Scheduled inspections (once per quarter per the Scheduled Maintenance System) of panels will be made.

Date of Full Compliance

1. Corrective action for item one is expected to be completed by November 7, 1986.
2. Corrective action for item two will be completed by November 14, 1986.

- B. 10 CFR 50 Appendix B, Criteria XVI, states that "Measures shall be established to assure that conditions adverse to quality, such as...nonconformances are promptly identified and corrected."

Quality Assurance Surveillance Report 2-85-086, issued in August 1985, identified conditions wherein Plant Procedures Manual Procedure 1.3.7, "Maintenance Work Request," was not being completely followed in that significant omissions were identified on completed Maintenance Work Requests. Plant management stipulated in a response letter, issued December 26, 1985, that as part of the corrective action, the surveillance report would be required reading for all maintenance supervisors. This action was to be accomplished by January 10, 1986.

Contrary to the above, as of June 23, 1986, the QA surveillance report had not been issued to the maintenance supervisors and they had not reviewed it. Similar omissions were also noted to have occurred on recently completed Maintenance Work Requests (e.g., AU1430, AU2128, AU3181 and AU538).

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The issue of timeliness is discussed in Appendix B of this report.

Corrective Steps Taken/Results Achieved

Upon discovery of the omission, Maintenance supervisors immediately read the December 26, 1985 letter and QA Surveillance Report 2-85-086. This is documented on a required reading sheet.

To further strengthen our review process, we have recently increased the amount of post-work review of MWRs by Maintenance personnel. This has been effective.

Corrective Action to be Taken

None

Date of Full Compliance

N/A

- C. 10 CFR 50 Appendix B, Criterion X, states in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. If mandatory inspection hold points, which require witnessing or inspecting by the applicant's designated representative and beyond which work shall proceed without the consent of its designated representative are required, the specific hold points shall be incorporated in the appropriate documents."

Contrary to the above, on June 27, 1986, criteria for the designation of appropriate quality control inspections and the establishment of hold points for safety related maintenance activities, not specifically prescribed by applicable codes, had not been established in written procedures. As a result, the following were identified:

1. Residual Heat Removal flow control valves FT-15B and FT-15C were installed on May 25, 1986. No QC inspection was made of the torque values applied to the attachment bolts for the flow control valves.
2. There was no QC inspection of the torque values applied or of torque wrenches used during installation of the bolts for the air start motors on the emergency diesel generators in April-May, 1986.

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



Validity of Violation

The Supply System acknowledges the validity of this violation in that existing written procedures did not contain definitive criteria for the determination of appropriate quality control inspection of safety-related corrective maintenance.

Corrective Steps Taken/Results Achieved

1. Torque values for RHR-FT-15B and RHR-FT-15C were verified to be within specification and witnessed by Plant QC. Torque values for the diesel air start motors hold down bolts were checked and found not to meet procedural specifications. These bolts were retorqued to specifications and witnessed by Plant QC. A nonconformance report was issued to document the bolt undertorquing.
2. An interim QC corrective maintenance inspection program, staffed by additional personnel, has been implemented (September 15, 1986) requiring QC inspection of all Quality Class I (safety-related) corrective maintenance activities which can affect the component's design function. This will be continued until the improvement actions defined below are implemented.

Corrective Action to be Taken

An overall upgrade of the Plant Quality Control inspection program for corrective maintenance is being undertaken which will include the following elements:

1. Improvements
 - a. Definitive criteria will be established to identify critical maintenance on safety-related plant components.
 - b. 100% quality control inspection of critical maintenance on safety-related plant components will be performed.
2. Long-term Refinements
 - a. Periodic assessment of plant and industry information to assure that criteria for critical maintenance activities remains current and pertinent.
 - b. Documented, justifiable inspection sampling program for those work activities on safety-related components and work on components important to safety and reliability.

Date of Full Compliance

- 1a. Initial criteria will be established by November 1, 1986.
 - 1b. Inspection of Quality Class I corrective maintenance utilizing aforementioned criteria will be implemented by November 1, 1986.
 - 2a. Program to assess and update criteria will be established by March, 1987.
 - 2b. Sampling program for corrective maintenance will be established by September 15, 1987.
- II. As a result of the inspection conducted between June 10 and July 10, 1986 (Inspection Report No. 86-22), and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violations were identified.

Technical Specification 6.8.1 reads, in part:

"Written procedures shall be established, implemented, and maintained covering the activities referenced below:

g. Fire Protection Program Implementation."

- A. Administrative Procedure 1.3.35 Revision 1, dated January 6, 1986, reads, in part:

"1.3.35.6 Flammable or Combustibles Procedures

"B. Flashpoint 100°F or less.

- 1. Examples acetone, alcohol, thinner, etc.
- 2. Less than one gallon - all plant areas.
 - a. Safety can required
- 5. Flammable liquids must be removed and put into storage.
 - a. At end of job or
 - b. At end of shift if job is not continuous between shifts.

"E. Aerosol Containers

- 1. Alcohol and Petroleum base or flammable contents.
 - a. Kept at work site in limited quantity.

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- b. Removal from jobsite at end of job or shift.
- d. Storage in approved cabinets in designated areas"

Contrary to the above:

1. On June 11 and 12, 1986, a 1 pint plastic spray bottle (not an approved safety container) containing alcohol was unattended on the 606' elevation of the Reactor Building (a plant vital area).
2. On June 12, 1986, in battery charger room #1 a one pint plastic poly bottle (not an approved safety container) of "Age Guard Silicon Fluid" labeled "Keep Away From Heat or Flame" was unattended. No work was in progress.
3. On June 12, 1986, in the Division 1 Switchgear Room, Room C208, an aerosol can labeled "enamel" "Extremely Flammable" was unattended in an open crew box (not an approved cabinet or a designated area). No work was in progress in the area.

This is a Severity Level IV Violation (Supplement 1), and is similar to a violation cited in inspection report 50-397/85-22.

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

There has been an added emphasis on the control, use and storage of flammable or combustible materials. We have held department shop meetings to reemphasize the requirements of PPM 1.3.35.

In concert with the aforementioned response to item I.A.6 of the inspection report, an increased awareness through the Floor/Area Coordinator and feedback mechanism will ensure more strict compliance with PPM 1.3.35.

Corrective Action to be Taken

1. PPM 1.3.35 will be revised.
2. As presented in our letter (G02-86-0883: "Fire Protection Program Reevaluation": G.C. Sorensen to J. B. Martin: Dated 9/16/86), we are evaluating our program requirements and methods to ensure compliance.

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Date of Full Compliance

1. Corrective action for item one will be completed by November 7, 1986.
 2. Corrective action for item two will be completed by December, 1986
- B. Administrative Procedure 1.3.35, Revision 1, dated January 6, 1986 reads, in part:

"F. 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.
3. When removal is not possible, a Transient Combustible Permit is required.

"I. All waste, debris, scrap, oil spills, or other combustibles resulting from the work activity shall be removed from all vital and critical plant areas immediately following completion of the job or the end of shift if work is not continuous between consecutive shifts.

"J. All temporary wood/blocking used in the plant shall be treated with a U.L. listed pressure impregnated process."

Contrary to the above:

1. On June 11, 1986 and on June 12, 1986, after the end of the normal workday shift, the following described combustible materials were in vital areas of the plant as indicated below, with no transient combustible permit posted at any of the locations and no work in progress at any of the locations.
 - a. Reactor Building 501' elevation:
 - o A large (approximately 2' x 3' x 3') cardboard box on an untreated wood block stand was located beside the Standby Liquid Control area.
 - o A large yellow plastic bag containing some clothing was located inside of the shielded area in the NW corner.

b. Reactor Building 522' elevation:

- o Two (2) large cardboard boxes of combustibles were located in the NW corner.
- o A 10 gallon trash can full of oil-soaked paper, such that the lid was propped open, was located in the N.W. corner. The label on the can read "empty nightly."
- o A pile of trash on the floor including cloth, plastic and cardboard, located in a corner under an instrument labeled TB&R 494.
- o In front of the primary containment entry was an accumulation of combustible materials, both inside and outside of a roped off area. These materials included:
 - o A number of hoses outside of the roped area.
 - o A barrel overflowing with used protective clothing.

c. A cardboard box of trash was in the Remote Shutdown Room.

2. On 6/12/86 after the end of the normal work day and shift the following described combustible materials were in vital areas of the Reactor Building and the Radwaste Building, with no transient combustible permit posted at any of the locations and no work in progress at any of the listed locations. The types of material and locations were as follows:

a. 606' elevation of Reactor Building:

- o Two Brag boxes of paper towels and various other cleaning materials were in the area above the reactor vessel.

b. 522' elevation of Reactor Building:

- o A cardboard box (approximately 1' x 2' x 2') full of plastic sheets was in front of the electronics counting room.
- o Small piles of cloth and plastic were under instruments labeled as IR 71 and RRC PT 38A.
- o An accumulation of combustible materials, both inside and outside of a roped off area, was in front of the primary containment entry. These materials included:

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- o A lab coat hanging from scaffolding, (outside the roped off area), and another hanging on a nearby cart
 - o A full Brag box of paper
 - o A large plastic cart filled with full bags of radwaste and protective clothing.
- c. 548' elevation of Reactor Building:
 - o A large pile of hoses, protective clothing and plastic was near the entry to door R-504 by the stairwell.
 - o A large plastic cart filled with full bags of radwaste and protective clothing was in the S.W. corner.
 - o An enclosure built with plastic sheets for thermolag work contained 2 cardboard boxes and 1 brag box. Outside of this enclosure was a large (approximately 2' x 2' x 3') cardboard box of filters.
- d. 501' elevation of Reactor Building:
 - o A pile of hoses and a Brag box of paper towels was in the N.W. corner.
- e. Radwaste Building:
 - o A pile of hoses and electrical cord was in the Control Room Emergency Ventilation Room.

This is a Severity Level IV Violation (Supplement 1) and is similar to violations cited in inspection reports 50-397/85-05, 50-397/85-20 and 50-397/85-22.

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

There has been an added emphasis on the control, use and storage of flammable or combustible materials. We have held department shop meetings to reemphasize the requirements of PPM 1.3.35. Recent NRC inspections have resulted in favorable comments; however, additional emphasis will have to be made during major maintenance/refueling outages.

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In concert with the aforementioned response to item I.A.6 of the inspection report, an increased awareness through the Floor/Area Coordinator and feedback mechanism will ensure more strict compliance with PPM 1.3.35.

Corrective Action to be Taken

PPM 1.3.35 will be revised.

Date of Full Compliance

Corrective action will be completed by November 7, 1986.

- C. Administrative Procedure 1.3.35 Revision 1 dated January 6, 1986 reads, in part:

"1.3.35.8 Fire Protection System Impairment Check List Procedure

"A. Required when

6. Leaving a normal closed fire door or damper in open position.

"E. Approval and Use

1. Completed permit to Shift Manager/Shift Support Supervisor for approval.
4. Hard copy posted at job site."

Contrary to the above:

1. On June 11 and on June 12, 1986, Fire door R 5-17 (a required 3-hour fire barrier) on the 522' elevation of Reactor Building was propped open with a scaffolding clamp and no fire systems impairment permit was posted in the area. Hourly fire watch tours were being performed in the area to meet other requirements of the fire protection plan.
2. On June 12, 1986, Fire door R-408 (a required 3-hour fire barrier) on the 522' elevation of the Reactor Building was propped open with a wooden broom. Also, tape was over the latch, thereby rendering the door inoperable. No fire system impairment permit was posted in the area. Hourly fire watch tours were being performed in the area to meet other requirements of the fire protection plan.

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

Validity of Violation

The Supply System acknowledges the validity of this violation.

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Corrective Steps Taken/Results Achieved

All fire doors are clearly marked.

Operators and Fire Tour personnel were previously informed to verify fire doors were in proper position while on tour.

Corrective Action to be Taken

It will be reemphasized to Operators and Fire Tour personnel to ensure that fire doors are closed, or have an impairment posted, while on tour.

Date of Full Compliance

Corrective action will be completed by November 14, 1986.

APPENDIX B

During the Enforcement Conference held at the NRC Region V office in Walnut Creek, California on August 28, 1986, the Supply System addressed certain discrepant conditions (of a repeat nature) which had been previously identified by the NRC.

The repeat nature of the discrepancies was an indication that Supply System Management needs to improve their effectiveness in (1) providing adequate corrective actions to preclude discrepancy recurrence and (2) providing followup reviews to verify corrective action performance.

Accordingly, this appendix has been prepared which outlines the Supply System program for improving corrective action performance. The program consists of several elements which are discussed as follows.

A. Management Involvement in Plant Operations

Management initiatives have been established to improve oversight and control. These initiatives focus on an in-line measurement control program, and also utilizes Quality Assurance feedback as a measure of performance during the implementation of the program. The program works as follows:

1. A plant objective/expectation is defined.
2. A program is developed and implemented.
3. In-line management measurement and control, coupled with Quality Assurance feedback, ensures that the goal is achieved.

In addition to the program described, the following is to be performed:

1. Periodic Directorate reviews will be performed which focus on performance feedback. This is in concert with Corporate Goals and Objectives which strive for excellence.
2. Periodic Plant Department reviews will be performed, which focus on performance, to ensure that Plant-specific goals are formulated to achieve Corporate Goals.
3. Organizational realignments have been made to increase supervision of major work control functions. This includes:
 - a. Establishment of an area coordinator/foreman concept to provide for more management visibility in the field.
 - b. Foreman job descriptions have been modified to emphasize housekeeping, tool control, etc.

10/10/10



B. Housekeeping Improvements

1. Program/implementation changes (in conjunction with the revisions of Administrative PPMs 1.3.19 and 1.3.35)
 - a. Frequent inspections will be performed.
 - b. Individual floor assignments/accountability will be defined.
 - c. More involvement by first-line supervisor/foreman will be established to ensure proper housekeeping during and after a job.
 - d. Additional temporary laborers have been hired to implement an immediate, intensive cleanup of critical Plant areas.
 - e. A management expectation letter will be issued (along with shop meetings) to clearly define Supply System expectations of Plant employees.
2. Feedback
 - a. Frequent inspections will be performed by Plant Manager's office personnel.
 - b. Unannounced, periodic inspections will be performed by Corporate officials.
 - c. Plant Manager office personnel will tour other Region V Plants for the purposes of identifying potential "good practices" which can be applied to WNP-2.

C. Fire Protection (Transient Combustion Control)

1. Program/implementation changes
 - a. Frequent inspections will be performed.
 - b. A reevaluation will be made regarding program requirements.
 - c. Active determinations of reasons for error with regard to program implementation will be performed.
2. Feedback
 - a. Frequent inspections will be conducted.
 - b. Bi-weekly inspections will be conducted by a Fire Protection Engineer. (Violators will be required to provide responses.)

10-10-10



D. Tool Control

1. Program/implementation changes
 - a. The Tool Crib will be attended on a 24-hour basis.
 - b. Tools will be checked out to individuals for accountability.
2. Feedback
 - a. Plant inspections will be performed on a routine basis.
 - b. Periodic audits of outstanding tools will be performed.

E. Measuring and Test Equipment (M&TE)

1. Program/implementation changes
 - a. All M&TE activities have been consolidated under a single supervisor.
 - b. A Maintenance Engineer has been hired to oversee day-to-day operations, and to track compliance.
 - c. A computerized check-in/check-out program has been implemented.
 - d. An M&TE traveler card system has been implemented.
 - e. Administrative procedure, PPM 1.5.4, "Control of Measuring and Test Equipment - Transfer Standards," has been revised to clearly identify responsibilities.
 - f. The Tool Crib will be attended on a 24-hour basis.
 - g. Periodic verification of M&TE inventory will be performed.
2. Feedback
 - a. Plant inspections will be performed on a routine basis.
 - b. A weekly report of discrepancies will be forwarded to Plant Management. This will continue until the error rate has been significantly reduced.

11/11/11



11/11/11



F. Quality Assurance Program Improvements/Feedback Enhancement

1. The QA Surveillance Program will be enhanced to include routine observation of maintenance work activities, with immediate feedback presented to performers and/or supervision.
2. A monitoring program will be implemented with regard to Plant initiatives and improvement programs. The intent of the monitoring program is to provide direct feedback to Plant Management on effectiveness of Plant initiatives and improvement programs.
3. Regarding Plant responsiveness to QA/QC concerns:
 - a. The existing monthly report will be modified to highlight QA/QC concerns and provide followup status of previous concerns to Plant and Licensing and Assurance Management.
 - b. Licensing and Assurance Management involvement will be increased in routine WNP-2 Plant QA activities.
 - c. QA surveillance deficiencies will be brought to the attention of Plant Management upon initial identification.
4. Regarding inspection of corrective maintenance:
 - a. A baseline Corrective Maintenance Inspection Program will be developed for critical Plant components.
 - b. Inspection attributes applied to corrective maintenance will be refined.
 - c. A sampling program will be developed for other-than-critical components.
 - d. Interim baseline inspection and attributes will be provided for corrective maintenance.
5. The existing Quality Control Inspection Program for important preventive maintenance will be enhanced.
6. The efficiency and effectiveness of the Quality Control Group will be improved by separating inspection planning and monitoring activities from inspection performance activities.

In conclusion, it has always been a Supply System commitment to ensure that operation of WNP-2 is safe, effective and consistent with NRC requirements. It is anticipated that the program, for long-term upgrades for improving performance, presented in this appendix will help to better achieve this commitment.

The Supply System recognizes the importance of active management involvement and followup to ensure that management's expectations are properly understood and implemented by Supply System personnel. The program presented in this appendix provides for increased overview of activities by in-line managers and supervisors; and establishes an area coordinator/foreman concept to provide for more management visibility in the field. The Supply System also plans to increase senior management involvement in WNP-2 activities, and provide periodic feedback to NRC regional management regarding Supply System management effectiveness.

