

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe      05000397  
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 SORESEN, G. C.      Washington Public Power Supply System  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 870610 ltr re violations noted in Insp Rept  
 50-397/87-13. Corrective actions: review of documentation  
 associated w/conditionally-released matl performed & each  
 case nonconformance rept dispositions approved.

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## NOTES:

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## Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

July 9, 1987

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2  
LICENSE NO. NPF-21  
NRC INSPECTION REPORT 87-13

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in the subject Inspection Report dated June 10, 1987. 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 regarding our response, please do not hesitate to contact me.

*AC Sorensen*

G. C. Sorensen, Manager  
Regulatory Programs

GCS/tmh  
Enclosures

cc: JB Martin - NRC RV  
RT Dodds - NRC Site  
RB Samworth - NRC

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## APPENDIX A

During an NRC inspection conducted on May 18-22, 1987, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings."

Operational Quality Assurance Program Description (WPPSS-QA-004), Revision 11, dated April 22, 1987, Section 5.2.1 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."

Quality Assurance/Quality Control Instruction No. PQC-09, Revision 5, dated January 31, 1986, entitled "Receiving Inspection," Section 3.4.3, states in part, that "Receiving inspector...fills out Conditional Release Tag...with the applicable NCR number authorizing conditional release".

Contrary to the above, during the period of August 1985 through January 1987, on four occasions Conditional Release Tags were completed by the receiving inspector prior to disposition of the applicable NCR's authorizing conditional release. The conditional release materials were controlled under Purchase Order Nos. 075190, 082262, 085260 and 081961.

This is a Severity Level IV Violation.

### Validity of Violation

The Supply System acknowledges the validity of this violation.

### Corrective Steps Taken/Results Achieved

A review of documentation associated with the conditionally-released material was performed and, in each case, the Nonconformance Report dispositions had been approved and the limitations corrected prior to declaration of operability. As a result, it has been confirmed that this problem was an administrative controls issue in that the conditional release tags were filled out prior to receipt of the approved Nonconformance Report.



Corrective Action to be Taken

1. Plant Procedure 1.3.12, "Plant Problems," and Plant QC Procedure PQC-09, "Receiving Inspection", will be revised to more clearly explain the existing levels of control and approval required for the conditional release of safety-related items.
2. Plant QC Inspectors, Maintenance Engineers and Technical Engineers who initiate or process conditional releases will be provided training on the conditional release of safety-related items.

Date of Full Compliance

October 30, 1987

