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 AUTH.NAME AUTHOR AFFILIATION  
 SORESENSEN,G.C. Washington Public Power Supply System  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 871204 ltr re violations noted in Insp Rept  
 50-397/87-27.Corrective actions:employee counseled.

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## Washington Public Power Supply System

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

December 31, 1987  
G02-87-294

Docket No. 50-397

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

Gentlemen:

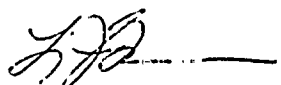
Subject: NUCLEAR PLANT NO. 2  
LICENSE NO. NPF-21  
NRC INSPECTION REPORT 87-27

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated December 4, 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, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

  
for G. C. Sorensen, Manager  
Regulatory Programs

JDA/bk  
Attachments

cc: JB Martin - NRC RV  
NS Reynolds - BCP&R  
RB Samworth - NRC  
DL Williams - BPA  
NRC Site Inspector - 901A

APPENDIX A

During an NRC inspection conducted on October 1 - November 5, 1987 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

A. Technical Specification 6.2.2.f states in part that:

"An individual should not be permitted to work more than ... 24 hours in any 48 hour period.... Any deviation from the above shall be authorized by the Plant manager or his deputy, or higher levels of management in accordance with established procedures...."

Contrary to the above, on June 16, 1987, a maintenance electrician worked 16.5 hours and on June 17, 1987, worked 12 hours on safety related motor operated valves which exceeded 24 hours in a 48 hour period. No authorization was granted to exceed this limit.

This is a Severity Level V Violation (Supplement 1)

Validity of Violation

The Supply System acknowledges the validity of the violation. The previous actions that were taken to preclude exceeding our overtime guidelines without prior approval appear to be inadequate.

In this particular case, the individual involved failed to follow previously established overtime authorization provisions and a supervisor failed to effectively monitor the number of hours the individual had worked (with respect to those provisions). This led to the employee not taking the required eight hour break between work periods.

This item was also the subject of a union grievance meeting whereby the individuals involved contended they had misinterpreted the procedural requirement of an eight hour break between work periods. It is stated in PPM 1.3.27, "Overtime Control", that a break of at least eight hours shall be allowed between work periods, including shift turnover time. The misunderstanding was satisfactorily resolved during the meeting in that the individuals recognized the eight hour break requirement.

Corrective Steps Taken/Results Achieved

As a result of the infractions of overtime controls, a Plant Nonconformance Report (NCR) has been generated which documents this infraction. The employee and foreman were counseled and reinstructed as to our requirements on the proper control and authorization for overtime. In addition, a review of the work performed by the employee during the period was conducted and determined to be adequate.

Corrective Action to be Taken

In order to achieve compliance with our overtime controls, plant and contractor employees will be instructed that the proper control of overtime will become an individual responsibility of each employee (and respective supervisor) at WNP-2. Each employee and supervisor will be held responsible to ensure compliance with the terms and conditions established in PPM 1.3.27, "Overtime Control." This redirection of responsibility will be accomplished by two parallel means.

- o A Plant Manager's directive will be issued to all personnel defining the problem and specifically directing their individual responsibility to ensure compliance.
- o PPM 1.3.27, "Overtime Control," will be revised to reflect this redirection of responsibility.

In addition, other Plant Procedures will be reviewed and revised as necessary to detail this responsibility.

Date of Full Compliance

February 29, 1988

B. Technical Specification 6.5.1.5 states in part that:

"The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or Vice Chairman and four members including alternates."

Contrary to the above, on September 4, 1987, Plant Operations Committee meeting 87-35.1 was conducted with the Chairman and three members.

This is a Severity Level V Violation (Supplement 1)

Validity of Violation

The Supply System does not agree with the validity of the violation. Plant Operations Committee Meeting 87-35.1 was conducted within the quorum requirement guidelines established in Plant Technical Specification 6.5.1.5 and PPM 1.1.5, "Plant Operations Committee." Both the Plant Operations Manager and the Plant Maintenance Manager left the plant shortly after the start of POC Meeting 87-35.1 to attend an NRC emergency exercise inspection critique. At the time of their departure from the plant, the current delegation of authorities at WNP-2 were in place. Both the Assistant Maintenance Manager and the Assistant Operations Manager have full authority in such manners during the absence of their direct managers. Therefore, in addition to five additional specialists present, POC 87-35.1 was conducted with a chairman, three members and one alternate.

This Notice of Violation may have resulted from incomplete information being provided to the NRC Senior Resident Inspector. Discrepancies may have existed pertaining to the actual times when the Plant Maintenance Manager was on site during September 4, 1987. In fact, the Maintenance Manager left the plant at 0822 hours to attend the meeting previously identified. POC Meeting started at 0815 hours and ended at 0845 hours.

The Supply System is, however, strongly committed to ensuring that the functioning of the Plant Operations Committee takes a very high priority. Plant Management has been very rigorous in ensuring that not only are quorum requirements technically complied with, but that all additional necessary expertise is in attendance to present and answer issues concerning the subject material reviewed at each meeting.



Corrective Steps Taken/Results Achieved

As a result of discussions with the NRC Senior Resident Inspector, the Plant Manager has re-emphasized his expectations to the WNP-2 Staff that the POC members dedicate the priority and commitment necessary to ensure that the Plant Operations Committee fulfills its intended mission.

Corrective Action to be Taken

None

Date of Full Compliance

Current



