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

SUBJECT: Responds to NRC 871216 ltr re violations noted in Insp Rept  
 50-397/87-12.Corrective actions:supply sys evaluated.

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**Washington Public Power Supply System**

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January 20, 1988  
G02-88-023

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 86-12

Reference: Letter, G02-86-0885, GC Sorensen to JB Martin,  
dated September 17, 1986

The Washington Public Power Supply System hereby replies to the Notice of Violation (NOV) contained in your letter dated December 16, 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. It should be noted that in the referenced letter the Supply System provided additional information relating to the issues described in the NOV.

It was agreed with members of your Staff (refer to Letter G02-88-019 GC Sorensen to NRC, dated January 15, 1988) that our response to the NOV would be due by January 20, 1988.

Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

*R B Glasscock*

*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

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APPENDIX A

During an NRC inspection conducted on April 28 through May 2, 1986, 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 (1985), the violations are listed below:

- A. Contrary to paragraphs (f) and (k) of 10 CFR 50.49 and section 5.0 of NUREG 0588, Category II, the Supply System's files did not adequately document qualification of two types of Rockbestos cable because documentation of qualification of type 780 polyethylene compound was not available.

This is a Severity level IV violation (Supplement I).

Validity of Violation

The Supply System does not agree with the validity of this violation. As stated in the referenced letter, environmental qualification of Rockbestos Cable is a well known issue throughout the industry and is documented in IE Notice 84-44.

Rockbestos responded with a testing program to establish long-term qualification of each cable type currently produced by the Company. Final Rockbestos reports were dated November 11, 1985, November 12, 1985 and March 12, 1986 for chemically-cured, irradiation-cured and coaxial cables, respectively.

Rockbestos also responded to NRC Inspection Reports and the IE Notice by justifying the capability of those cables to perform based on correlations between flawed Rockbestos testing and testing performed by others. These justifications were accepted by the NRC as being adequate interim qualifications.

At the time of the NRC Inspection in April 1986, the Supply System had incorporated the final Rockbestos reports and, with the assistance of Rockbestos, documented the similarity between all Supply System cable insulation and the Rockbestos tests with the exception of one wire in each of two cable types with the insulation material formulation KXL-780. The similarity between KXL-780 and the tested KXL-760 material was open at the time of the inspection.



However, this open issue was explicitly recognized in the Supply System documentation. Because of this open issue, the interim qualification documentation was still being maintained as part of the overall qualification package. In addition, the Supply System had initiated steps to obtain a TVA report which would complete qualification documentation for the KXL-780 compound. The report has been obtained, the file amended and the documentation deficiency closed.

Corrective Steps Taken/Results Achieved

The Supply System has since received the Rockbestos similarity evaluation which establishes that the test of the KXL-760 material formulation qualifies the KXL-780 material.

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

The Supply System is currently in full compliance.

- B. Contrary to paragraphs (f) and (k) of 10 CFR 50.49 and section 1.4 of NUREG 0588, Category II, the Supply System's files did not adequately establish qualification of Westinghouse low voltage containment penetrations because the plant total integrated radiation dose was not enveloped by referenced test conditions.

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

Validity of Violation

The Supply System does not agree with the validity of this violation. As stated in the referenced letter, the qualification file associated with the NRC concern (QID File 382003) referenced a separate Westinghouse document (PEN-TR-81-58). This document was referenced as providing "separate effects testing" which established the materials qualification capability of  $1.2E+08$  rads. As a result, it was correctly stated in the qualification file that supplemental separate material effects testing in conjunction with partial type testing was used to establish qualification to the appropriate radiation envelope. (It should be noted that 10 CFR 50.49, Section (f)4 allows partial type testing which is supplemented by analysis.)

Although this information was omitted on the summary sheet it was correctly defined in the body of the qualification file. However, this was not brought to the attention of the inspector at the time of the inspection.

Corrective Steps Taken/Results Achieved

The adequacy of the methodology specified in the Westinghouse report was subsequently confirmed by another Westinghouse report (PEN-TR-81-49) which qualified the low voltage penetrations by sequential-type testing to a radiation level of  $1.1E+08$  rads (total integrated dose) prior to LOCA testing. The Westinghouse report has now been inserted into the primary file.

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

The Supply System is currently in full compliance.

- C. Contrary to Criterion V of Appendix B to 10 CFR 50, the Supply System did not adequately implement procedures and instructions for the qualification, documentation, or component installations of the following equipment:

1. Victoreen high range radiation monitor, documentation
2. Conax connectors for HRRM, documentation
3. Barber Coleman motor, documentation
4. Rosemount 1151 transmitter, installation and non-EQ-file documentation and instructions

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

Validity of Violation

The Supply System acknowledges the validity of this violation with regard to the Victoreen monitor, Conax connectors and Barber Coleman motor. However, the Supply System has taken actions to correct these problems to ensure that they are not generic in nature.

The Supply System does not agree with the validity of this violation with regard to the Rosemount transmitter. As stated in the referenced letter, this issue depends on whether the plug for the unused conduit entry needed to be controlled. Prior to the modification to provide a silicone seal, the plugs were critical and control was required. However, after the modification, the plugs were no longer needed to provide a moisture barrier.

Contrary to the position of the NRC, the components were not modified without a written procedure. Field Change Record 86-047, Design Change Package 86-0101-0A and Plant Modification Record 86-0101-0 provide documentation in support of the work performed under Maintenance work Request AV-0570. At the time of the inspection the equipment was in a qualified configuration, with all similar equipment having been appropriately addressed.

#### Corrective Steps Taken/Results Achieved

1. As indicated in the referenced letter, the Supply System promptly resolved the specific concerns regarding these issues.
2. Refresher training has been provided to all personnel involved in the preparation, review and approval of Environmental Qualification files. The refresher training focused on the following:
  - Ensuring required accuracy for instrumentation is obtained and test results are evaluated to the required accuracy.
  - Ensuring installed configuration of equipment is similar to tested configuration, and where differences exist, supplemental analysis/testing has been accomplished to justify the differences.
  - Ensuring the methods used to address aging prior to accident testing are acceptable.
  - Ensuring when material analysis is used to address subcomponent's sensitivity to aging and radiation effects, that all critical components of the equipment are addressed.
3. A review of selected QID files, where these types of documentation problems could potentially occur, was performed to identify any similar problems. Any deficiencies noted have been, or are being, corrected.

#### Corrective Action to be Taken

No further corrective action is planned.

#### Date of Full Compliance

Although the Supply System is currently in full compliance with respect to the items identified in this NOV, the deficiencies noted during the review of selected QID files will be corrected by February 20, 1988.



10-1-78

