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SUBJECT: Submitts listed addl info to provide clarification of
 selected items in response to Notice of Violation 87-19.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

April 11, 1988
G02-88-086

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 87-19

Reference: Letter, R. Zimmerman (NRC RV) to G.C. Sorensen (SS), dated 3/2/88

As requested by the referenced letter, the following additional information is submitted to provide clarification of selected items in our response to Notice of Violation 87-19.

1. SSFI Response to Notice of Violation A.1

a) Issue:

Under "Corrective Action to be Taken" it is stated that no further corrective action is planned. Can we assume that the actions discussed in Appendix C are intended to correct the root cause of this violation?

b) Response:

Yes, the Appendix C activities correct the root cause of this violation, particularly those discussed in B, Further Near-Term Improvements Planned. The Supply System has addressed this specific problem generically by revising the DC voltage drop criteria and providing new calculations for all DC power circuits. In addition, an evaluation will be performed sampling both DC control and AC power circuits to assure that voltage drops in these will not degrade safety functions.

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2. SSFI Response to Notice of Violation A.2

a) Issue:

Under "Corrective Action Taken" your discussion does not address those currents which were too high for the trip times documented in the surveillance tests, e.g., valve RRC-V-16A.

b) Response:

The review of previous surveillance data discussed in the "Corrective Action To Be Taken" included a review for excessively high test currents. Only valve RRC-V-16A was tested with an excessively high current; all other valve test currents were within acceptable limits and met either Condition 1 or Condition 2 as described in our original response. Condition 1 states that actual test currents met or exceeded the required test currents while still meeting the required trip time, and Condition 2 states that the actual test current was compared to the manufacturer's relay curve to ensure that the minimum operating time requirement at that current was met. RRC-V-16A was retested using the correct test current and the overload relays failed to operate, even for long periods. The overloads were replaced and the test performed again successfully.

3. SSFI Response to Notice of Violation B

a) Issue:

The Corrective Action Taken does not describe any action to check for similar problems on other tanks at the site, nor is the root cause addressed, e.g., the need for effective independent design review.

b) Response:

On September 25, 1987 the Supply System sent the NRC Licensee Event Report (LER) Number 87-26. This report determined that the root cause of this event was inadequate process control of setpoint calculations during the startup of WNP-2.

The LER further states: "A task force led by a Plant Engineering Manager is reviewing the setpoint process based on the findings of the NRC SSFI." This task force is presently defining an acceptable setpoint methodology and is expected to complete this task during May 1988. After the methodology has been defined, all Plant setpoints will be reviewed to determine that the setpoint determination meets the methodology standard. If a setpoint determination does not meet these standards, it will be revised. Therefore, any tank requiring a level instrument setpoint determination will be reviewed, and all future setpoint calculations will be performed in accordance with the newly defined setpoint methodology.

4. SSFI Response to Notice of Violation C.2

a) Issue:

Under "Corrective Action to be Taken" it is stated that no further corrective action is planned. Can we assume that the corrective actions discussed in Appendix C are intended to correct the root cause of this violation?

b) Response:

Yes, the actions described in Appendix C are intended to correct the root cause of this violation. The root cause of this violation is the failure to translate design requirements to operational requirements.

Specifically, the second bullet under CMP Change Control Processes - Plant Modifications (page 9 of 12) commits to improve the design change process prior to the Spring 1988 refueling outage. These improvements include:

"Added assurance that design change implementation activity is completed before returning the affected system/component/structure to operability status by a walkdown, or inspection of the physical change, review of the affected plant procedures, review of the post-modification testing results, and confirmation that the "as-constructed" change conforms to all technical, operational, and safety requirements. This review will include interorganizational participation as appropriate."

5. SSFI Response to Notice of Violation C.3

a) Issue:

Your response states that the present installation of two electrical terminations is acceptable for drain lines. This appears contrary to the manufacturer's (Raychem) recommendation that drain line terminations should be covered with Heat Shrinkable Tubing (HST). Therefore, we request that you provide additional clarification supporting your position that these drain lines are acceptable as currently installed. Also, include an explanation addressing how circuit integrity is maintained if the exposed wire is not properly covered with HST.

b) Response:

The purpose of the drain line is to provide noise reduction for the instrument loop circuit. The purpose of the heat shrink tubing is two fold; one to prevent inadvertent grounding of the circuit, and the other to provide added structural integrity to the drain line. The two drain lines in question have heat shrink insulation installed, but at the cable breakout point approximately 1/8" of bare wire is exposed. The cables cannot physically come in contact with other cables or terminations without intentional physical force. Therefore, the present installation meets the ground prevention requirement. The second purpose of providing additional structural integrity to the wire is also met by the present installation. Since both purposes of heat shrink installation are met by the present installation, the circuit integrity by definition is also met.

6. SSFI Response to Notice of Violation C.4

a) Issue:

Your discussion under "Corrective Steps Taken" does not recognize the need for enhanced sensitivity by plant operators and supervision to improper plant modifications.

b) Response:

As stated in our previous response to this item, it is expected that the processes which are currently in place (to control Plant maintenance activities and design modifications) would prevent installation of the foam filters without the use of a written work request or proper review of the modification.

However, it was determined that an additional level of control for identifying and correcting such conditions could be applied with the use of the Area/Floor Coordinator concept of the housekeeping procedure. As a result, the decision was made to revise Plant Procedure (PPM) 1.3.19, "Housekeeping", to expand the responsibilities and expectations of the Area/Floor Coordinators. The intent of the revision is to identify degradation and abnormalities of equipment and structures, and bring such information to the attention of Plant Management. The training to be presented to the Coordinators will also provide an increased level of sensitivity in this area.

As a result of further review, it has also been determined that additional measures for enhancing awareness of this issue can be applied in the area of training. Accordingly, the type of training to be provided to the Area/Floor Coordinators will also be incorporated into the Maintenance and Equipment Operator Training Programs.

In a related matter, it was stated in our previous response that "the foam filters were immediately removed and an inspection was performed which confirmed that these filters were not installed on other switchgear." The scope of the inspection was to identify any filters which were installed on the outside of critical switchgear. However, after the response was sent to the NRC, it was brought to our attention by the Senior Resident Inspector that additional filters were installed inside SM-7 and HPCS switchgear. Accordingly, another inspection was performed for the purpose of identifying any other filters which were installed inside critical switchgear. During that inspection, filters were discovered inside HPCS and the load side of RHR Pump 2C critical switchgear. The filters were immediately removed.

All other switchgear has subsequently been inspected and, with the exception of the Main Generator Voltage Regulator Panel (non-critical switchgear), no additional filters were discovered. The filters installed in the Main Generator Voltage Regulator Panel are by design and are listed on the Bill of Material for the unit. To the best of our knowledge, no other such filters exist either on or inside Plant switchgear.

Should you have questions regarding this additional information, please contact Mr. P.L. Powell, Manager, WNP-2 Licensing.

Very truly yours,


G.C. Sorensen, Manager
Regulatory Programs

JDA/11g

cc: JB Martin, NRC RV
NS Reynolds, BCP & R
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