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FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
AUTH.NAME AUTHOR AFFILIATION
ARBUCKLE,J.D. Washington Public Power Supply System
POWERS,C.M. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-009-00:on 880401,two standby gas treatment sys Tech Spec surveillances not performed within time limits.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 1 W/8 ltr. SIZE: 4
TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

# LICENSEE EVENT REPORT (LER)

| FACILITY NAME (1) | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| Washington Nuclear Plant - Unit 2 | 0 5 0 0 0 3 9 7 | 1 OF 0 3 |

TITLE (4) Two Standby Gas Treatment System Technical Specification Surveillances Not Performed Within Time Limits - Personnel Error

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | |
|---|---|---|---|---|---|---|---|---|---|---|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | MONTH | DAY | YEAR | FACILITY NAMES | DOCKET NUMBER(S) |
| 0 4 | 0 1 | 8 8 | 8 8 | — 0 0 9 | — 0 0 | 0 5 | 0 2 | 8 8 | | 0 5 0 0 0 |
| | | | | | | | | | | 0 5 0 0 0 |

| OPERATING MODE (9) | 1 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11) | | | |
|---|---|---|---|---|---|
| POWER LEVEL (10) | 0 8 7 | 20.402(b) | 20.405(c) | 50.73(a)(2)(iv) | 73.71(b) |
| | | 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) |
| | | 20.405(a)(1)(ii) | 50.36(c)(2) | 50.73(a)(2)(vii) | OTHER (Specify in Abstract below and in Text, NRC Form 366A) |
| | | 20.405(a)(1)(iii) | X 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | |
| | | 20.405(a)(1)(iv) | 50.73(a)(2)(ii) | 50.73(a)(2)(viii)(B) | |
| | | 20.405(a)(1)(v) | 50.73(a)(2)(iii) | 50.73(a)(2)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

| NAME | TELEPHONE NUMBER |
|---|---|
| J.D. Arbuckle, Compliance Engineer | AREA CODE 5 0 9 3 7 7 - 2 1 1 5 |

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFAC-TURER | REPORTABLE TO NPRDS | CAUSE | SYSTEM | COMPONENT | MANUFAC-TURER | REPORTABLE TO NPRDS |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | |
| | | | | | | | | | |

| SUPPLEMENTAL REPORT EXPECTED (14) | | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
|---|---|---|---|---|---|
| YES (If yes, complete EXPECTED SUBMISSION DATE) | X NO | | | | |

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)


On April 1, 1988 it was discovered that the following 18-month Standby Gas Treatment (SGT) System surveillance procedures (PPMs) had not been completed within the required time frame plus 25% as required by the Plant Technical Specifications:

- PPM 7.4.6.5.3.5, "Standby Gas Treatment System HEPA DOP Test and Visual Inspection."
- PPM 7.4.6.5.3.6, "Standby Gas Treatment System Adsorber Bypass Leakage Test."

The procedures were due to be performed on November 12, 1987 and were overdue on March 23, 1988 (PPM 7.4.6.5.3.6) and March 25, 1988 (PPM 7.4.6.5.3.5). The procedures were successfully completed on April 1, 1988.

The cause of this event is personnel error in that a Plant Senior Health Physicist failed to route the Surveillance Monitoring System (SMS) computer tracking cards to the Plant System Engineer responsible for the performance of the surveillances. The SMS cards serve as a reminder to perform the surveillances. The effect was that an SGT System LCO was not met in that both SGT trains were technically (though not in fact) inoperable.

Further corrective actions include 1) counseling the Senior Health Physicist on the importance of distributing SMS cards in a prompt manner, 2) counseling Plant Health Physics Management/Supervision on effective utilization of SMS Status Reports, and 3) revising a Plant procedure to provide additional guidance on actions to be taken when a surveillance late date has been exceeded.

There are no unacceptable consequences associated with exceeding the required SGT System surveillance frequency. The procedures were successfully performed on April 1, 1988 and, as a result, the SGT System would have operated as designed during the event period.




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| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
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| Washington Nuclear Plant - Unit 2 | 0 5 0 0 0 3 9 7 | 8 8 | — 0 0 9 | — 0 0 | 0 2 OF 0 3 |

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Plant Conditions

a) Power Level - 87%
b) Plant Mode - 1 (Power Operation)

Event Description

On April 1, 1988 it was discovered that the following (18-month) Standby Gas Treatment (SGT) System surveillance procedures (PPMs) had not been completed within the required time period plus 25% as required by Plant Technical Specification Section 4.6.5.3 (b.1):

- PPM 7.4.6.5.3.5, "Standby Gas Treatment System HEPA DOP Test and Visual Inspection." The procedure, which is used to test HEPA filters SGT-HF-1A1, 1A2, 1B1, and 1B2, was last completed on May 13, 1986.

- PPM 7.4.6.5.3.6, "Standby Gas Treatment System Adsorber Bypass Leakage Test." The procedure, which is used to test charcoal filters SGT-1A1, 1A2, 1B1 and 1B2, was last completed on May 7, 1986.

The procedures were due to be performed again on November 12, 1987; were overdue on March 23, 1988 (PPM 7.4.6.5.3.6) and March 25, 1988 (PPM 7.4.6.5.3.5); and were not completed until April 1, 1988.

The cause of this event is personnel error in that a Plant Senior Health Physicist failed to route the Surveillance Monitoring System (SMS) computer tracking cards to the Plant System Engineer responsible for the performance of the surveillances. A computer card is produced by the SMS for each Plant surveillance tracked to notify cognizant personnel that the task is due and to document task completion for SMS feedback. On a periodic basis, SMS Backlog Reports (reports of those tests which have exceeded the due date) and SMS Violation Reports (reports of those tests which have exceeded the late date) are issued to the responsible Department Manager/Designee. As a result, a contributing factor to this event was that Plant Health Physics Management/Supervision did not effectively utilize these reports in monitoring completion of the surveillances.

The Senior Health Physicist had received the cards on or about February 1, 1988. On March 30, 1988 he noted that the cards were still in his possession and routed them to the System Engineer. The System Engineer noted that the surveillances were late (but did not realize the 125% limit had been exceeded), and on March 31, 1988, the tests were started. On April 1, 1988 the procedures were successfully completed at 0935 hours.

Also, on April 1, 1988, during a reexamination (by the System Engineer) of the dates the procedures were due to be performed, it was discovered that they had not been completed within the required time frame plus 25%. The result was an inadvertent failure to meet the operability requirements for the SGT System LCO that two independent SGT trains be operational during Operational Conditions 1, 2, 3 and when irradiated fuel is being handled in the secondary containment and during core alterations and operations with a potential for draining the reactor vessel.

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Immediate Corrective Action

Plant procedures 7.4.6.5.3.5 and 7.4.6.5.3.6 were completed on April 1, 1988. The acceptance criteria for each procedure were met.

Further Corrective Action

- The Senior Health Physicist involved in this event was counseled on the importance of distributing SMS cards in a prompt manner.
- Plant Health Physics Management/Supervision was counseled on effectively utilizing SMS Status Reports to monitor completion of the tasks for which they are responsible.
- PPM 1.5.1, "Technical Specification Surveillance Testing Program," will be revised to better define 1) the relationship between the surveillance due date and late date, and 2) actions to be taken when a late date has been exceeded.

Safety Significance

There were no unacceptable consequences associated with exceeding the required SGT System surveillance frequency. The procedures were completed on April 1, 1988 and the acceptance criteria for each procedure were met. As a result, the SGT System would have operated as designed during the event period. Accordingly, this event did not affect the health and safety of either the public or Plant personnel.

Similar Events

84-062, 84-111, 85-004 and 87-027

EIIS Information

| Text Reference | EIIS Reference | |
|---|---|---|
| | System | Component |
| Standby Gas Treatment (SGT) System | BH | |
| SGT-HF-1A1, 1A2, 1B1 and 1B2 | BH | FLT |
| SGT-CF-1A1, 1A2, 1B1 and 1B2 | BH | FLT |

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

Docket No. 50-397

May 2, 1988

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

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 88-009

Dear Sir:

Transmitted herewith is Licensee Event Report No. 88-009 for the WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Very truly yours,

C.M. Powers (M/D 927M)
WNP-2 Plant Manager

CMP:lg

Enclosure:
Licensee Event Report No. 88-009

cc: Mr. John B. Martin, NRC - Region V
Mr. C.J. Bosted, NRC Site (M/D 901A)
INPO Records Center - Atlanta, GA
Ms. Dottie Sherman, ANI
Mr. D.L. Williams, BPA (M/D 399)

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