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 SORESENSEN, G.C. Washington Public Power Supply System
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SUBJECT: Responds to NRC 880418 ltr re violations noted in Insp Rept 50-397/88-02.

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Washington Public Power Supply System

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

May 18, 1988
G02-88-117
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 88-02

Reference: 1) Letter G02-88-025 (Original Response to NOV 87-19),
G. C. Sorensen (SS) to NRC, dated 1/29/88
2) Letter G02-88-086 (Supplemental Response to NOV 87-19),
G. C. Sorensen (SS) to NRC, dated 4/11/88

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated April 18, 1988. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendices A and B (attached).

Appendix A addresses each violation with an explanation of our position regarding validity, corrective action(s) and date of full compliance. The requested root cause assessment of the design review inadequacies, corrective actions, including a schedule for completion, and assessment of the quality of modifications that have been previously installed in the Plant will be sent by separate transmittal on May 27, 1988.

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

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

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Attachments

cc: J. B. Martin - NRC RV
N. S. Reynolds - BCP&R
R. B. Samworth - NRC
D. L. Williams - BPA
NRC Site Inspector - 901A

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APPENDIX A

During an NRC inspection conducted on January 21, 1988 - March 10, 1988, two 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. 10 CFR 50, Appendix B, Criterion XVI states in part, "Measures shall be established to assure that conditions adverse to quality, such as . . . deficiencies . . . and nonconformances are promptly . . . corrected." This requirement is implemented by Section 16.2.1 of the licensee's Operational Quality Assurance Program Description (OQAPD).

10 CFR 50.9(a) requires, in part, that information required to be maintained by licensees be complete and accurate in all respects.

Contrary to the above, on February 3, 1988, one of the foam filters identified in NRC inspection report 87-19 had not been removed as reported by the licensee, and additional filters were in the electrical exciter cubicle for the High Pressure Core Spray Diesel Generator.

This is a Severity Level IV violation (Supplement 1).

Validity of Violation

The Supply System acknowledges the validity of this violation. As stated in our supplemental response to NOV 87-19 (Reference 2), the scope of the inspection was to identify any filters which were installed on the outside of critical switchgear. However, after the original response to NOV 87-19 (Reference 1) 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. The cause of this violation was the Supply System's for not expanding the inspection to include other potential filter locations.

Corrective Steps Taken/Results Achieved

All other Plant 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.

Corrective Action to be Taken

As stated in both References 1 and 2, Plant Procedure (PPM) 1.3.19, "Housekeeping", will be revised 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. In addition, training will be developed and provided to the coordinators on these responsibilities and expectations. The intent of this corrective action is to identify unauthorized Plant modifications of the type identified in this violation.

A criteria list will be developed which defines what constitutes a Plant modification. Training on the modification criteria will be provided to Maintenance, Operations (Equipment Operators) and Plant Technical personnel. The intent of this corrective action is to provide an additional level of awareness in preventing Plant modifications without utilization of the existing programmatic controls.

Date of Full Compliance

The Supply System is currently in full compliance.

The Area/Floor Coordinator training program will be developed by June 30, 1988 and the training will be accomplished by August 31, 1988.

Plant Maintenance, Operations (Equipment Operators), and Technical Staff personnel will be trained on the modification criteria by September 30, 1988.

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3. A detailed electrical/I&C re-review of the ATWS-ARI design change was conducted in addition to the requirement review described in Item 2 (above). These reviews included complete wiring and physical layout re-checks. Problems identified during this review have been corrected by Field Change Notices or other Design Change Packages.
4. A detailed root cause evaluation of the ATWS modification design errors was performed by the Supply System Quality Assurance Directorate. The root causes identified include schedule pressures, inadequate checking, fragmented elementary wiring diagrams, failure of management to provide adequate technical guidance/oversight and not following procedures. The conclusions of the root cause evaluation are being factored into the engineering improvement plan.

Corrective Action to be Taken

Preparation of an engineering improvement plan with the goal to provide a bottoms-up plan to improve the engineering management process and create an environment that fosters quality in the engineering design control process. The plan addresses planning and scheduling, technical leadership, training in expectations on design checking and verification as well as other aspects affecting engineering design quality. The engineering improvements will be included in a more comprehensive improvement plan which is being developed. In addition to the engineering improvements, improvement plans will also be developed for plant modification implementation and quality assurance engineering. Supply System management will review the improvement plan with the NRC during the management meeting scheduled for June 3, 1988.

Date of Full Compliance

- o The ATWS-ARI design package is currently in compliance with the design requirements and Supply System commitments.
- o The documentation inadequacies identified as a result of the design requirement review, discussed in item 2 above, will be corrected or dispositioned by August 30, 1988. The incomplete items will be tracked to completion and/or completed within the normal process of revising design data base documentation.