WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

July 22, 1988
G02-88-160

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 88-20

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 23, 1988. 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.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

SLW/bk
Attachments

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

APPENDIX A

As a result of the inspection conducted during the period of May 16 to May 25, 1988, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violation was identified.

10 CFR Part 50 Appendix B, Criterion V, as implemented by Section 5.2.1 of Washington Public Power Supply System's Operational Quality Assurance Program Description, Revision 11, stated: "Activities that affect safety-related functions of plant items shall be described by and accomplished through implementation of documented procedures, instructions, or drawings as appropriate."

Procedure 1.3.12, "Plant Problems", Revision 10 and 11, step 1.3.12.5.A.1 requires that any person who observes a plant problem should immediately notify his/her supervisor and initiate a problem deficiency report/nonconformance report.

Contrary to the above, as of May 24, 1988:

1. A nonconformance report had not been prepared for a safety-related fuel bundle that had been stepped on by a technician on April 12, 1988 despite the fact that plant staff believed that this was a plant problem as indicated by their notifications to management.

2. A nonconformance report had not been prepared for a plant problem involving broken tabs on melamine torque switches used in the motor actuators for safety-related valves MS-67D (first identified on May 7, 1988) and MS-67A (first identified on May 13, 1988).

This is a severity Level IV Violation (Supplement I).

Validity of Violation

The Supply System acknowledges the validity of the violation.

The Plant Problem procedure (PPM 1.3.12) was originally written to specifically address those plant problems which are nonconforming conditions and therefore require corrective action. Except for the cam lug problem all the other examples cited in the Inspection Report were potential problems and at that time it was not mandatory to document potential problems. In May, 1988 in response to a QA concern an agreement was reached to document Generation Engineering concerns (potential problems) using the Plant Problems procedure. In May, 1988 the Plant manager verbally directed that the Plant Problem process could be used to document potential problems plant wide. At the time this NOV was written the Plant Manager's direction had just been announced.

Initiating the potential problem nonconformance report improves the timeliness of Plant Management awareness of potential problems. All newly generated nonconformance reports (NCRs) are reviewed every morning in a management meeting which is chaired by the Plant Manager/ Assistant Plant Manager and attended by all Plant Department Managers. Therefore in most cases management is informed of all plant problems and potential problems within twenty four hours.

In the case of the stepped on fuel bundle, the plant engineer with assistance and concurrence from the fuel vendor representative determined what augmented inspection methods would be implemented to ensure that no damage occurred. The inspection performed concluded no damage had occurred and was documented on a Discrepancy Sheet. Due to an existing QA surveillance concern, the Plant Procedure PPM 6.2.2 "New Fuel Handling, Railroad Bay to Refuel Floor, Activities" in use at the time of the stepped on fuel bundle was revised to specifically require a discrepancy report evaluation to document potential problems. Each discrepancy sheet is dispositioned and accepted by both the fuel vendor representative and the Supply System fuels custodian. Since no actual nonconforming condition existed, and the issue has been satisfactorily resolved, there is no need to backfit an NCR.

In the matter of the broken torque switch tabs, it should be clarified that the motor operators on valves MS-V-67A and B had the broken cam lug tabs instead of MS-V-67A and D as cited in the Inspection Report.

The concern raised in the NOV is valid in that a condition was discovered that could have caused component failure and the condition was not properly documented on an NCR. On May 12, 1988 a Plant NCR (288-141) was written to document Limitorque Valve Motor Operator torque switch binding problems. Prompt actions were taken to replace all torque switches utilizing Melamine material, cause of binding problem, in an application that could result in cam binding. The need to further evaluate the broken cam lug (tab) problem (an additional failure of the same piece part) using the NCR process was not considered since replacement with a new (different material) torque switch would also eliminate the broken cam lug problem.

Corrective Steps Taken/Results Acheived

By the end of the Spring 1988 refueling and maintenance outage, a total of 35 valve motor operator torque switches were replaced. This represents all valves using the defective torque switches which are required for safety system operability. Since the end of the outage an additional six valve motor operator torque switches have been replaced. These six valves were not required for safety system operability.

On May 25, 1988 the broken torque switch cam lug problem was added to NCR 288-141. On June 20, 1988 this condition was reported as both a 10CFR Part 21 and a 10CFR 50.73 reportable event via the Licensee Event Reporting system to the NRC. See LER 88-017.

Following the direction to report potential problems using the NCR process, NCR 288-197 was written to document the degraded grease condition. Resolution of the degraded grease problem is still pending. The spring pack problem cited in the Inspection Report has been satisfactorily resolved.

Corrective Action to be Taken

The Plant Problems Procedure (PPM 1.3.12) is being revised to formally implement the "potential problem" NCR process. A letter will be sent to all plant personnel describing program changes. This letter will be issued on the day the procedure revision is scheduled to be issued, August 15, 1988.

A totally new Plant Problem process is being developed by which actual problems and potential problems will be documented on a potential problem report. It is expected that his new Plant Problem process will be ready for implementation by January 1, 1989.

Four motor operator valve torque switches which do not affect safety system operability still require replacement. This work can be accomplished while the plant is operating and is currently scheduled for completion by August 15, 1988.

An interim inspection for degraded grease in the motor operators of selected valves in the steam tunnel will be performed if the plant is shutdown between October 1, 1988 and the Spring 1989 refueling and maintenance outage.

The grease in all the motor operators of all safety function valves in the drywell and main steam tunnel will be changed during the Spring 1989 refueling and maintenance outage.

Date of Full Compliance

The plant is currently in full compliance and the planned changes to the NCR process will further improve plant responsiveness to potential problems.

The revised Plant Problems procedure will be issued August 15, 1988.

The "new" Plant Problem process will be implemented by January 1, 1989.

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