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ACCESSION NBR:8809290114 DOC.DATE: 88/09/23 NOTARIZED: NO DOCKET #
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SUBJECT: Responds to NRC 880824 ltr re violations noted in Insp Rept
 50-397/88-21.Corrective actions:

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 23, 1988
G02-88-205

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 88-21

D The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 24, 1988. Our reply, pursuant to the provision of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, each violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA, 399
NRC Site Inspector - 901A

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APPENDIX A

During an NRC inspection conducted on May 30 - July 7, 1988, the following 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, these violations are listed below:

- A. Section 3.4.6.1 of the Technical Specifications states in part, "The reactor coolant system temperature and pressure shall be limited ..., with:
a. A maximum heatup of 100° in any 1-hour period,..."

Contrary to the above, a reactor coolant system heatup of approximately 137°F occurred during a plant startup on June 27, 1988.

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

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

1. Regarding exceeding the heatup limitation of Plant Technical Specification 3.4.6.1 on June 27, 1988:
 - a) Plant heatup was immediately terminated when determined to be excessive.
 - b) An Engineering evaluation was performed which concluded that no safety concerns were created by the excessive heatup rate.
 - c) Plant Procedure 7.4.4.6.1.1, "RPV (Reactor Pressure Vessel) Temperature/Pressure Log," was revised to provide additional guidance on control of Plant heatup and cooldown evolutions. Significant changes made to prevent recurrence of this situation include:
 - heatup and cooldown rate is limited to 20°F during each 15 minute period.
 - heatup and cooldown rate is limited to 80°F per hour.



- heatup/cooldown and RPV Pressure/Temperature Monitoring activities were divided into separate sections.
 - A steam table was provided to convert steam pressure (in PSIG) to temperature.
- d) A heatup and cooldown program has been added to the Plant status display on the Control Room Process Computer CRT. The program graphically displays heatup/cooldown in relation to 80°F/hr reference lines. In addition, digital displays indicate projected heatup/cooldown rates based on 15, 30 and 45 minute temperature changes. This information is updated every 60 seconds. Digital displays are also provided for actual hourly rates. An alarm function is provided for both projected and actual rates when the 80°F/hr limit is exceeded.
2. Regarding the followup actions associated with the potential heatup/cooldown problems identified in Plant QA Surveillance Report 2-88-018, Plant Operations failed to recognize the significance of the issue with regard to preventing recurrence due to lack of rigor and discipline in the initial review process.

Corrective Action to be Taken

1. Plant Operations Management will emphasize, to the Operations staff, the need for increased awareness and a more effective quality review of Plant QA Surveillance Reports.
2. General Operating Procedures, for Plant startup and shutdown evolutions, will be revised to limit hourly heatup and cooldown rates to a maximum of 80°F.

Date of Full Compliance

Although the Supply System is currently in full compliance, further corrective actions will be completed by October 31, 1988.

- B. 10CFR50.73.d states in part, "Licensee Event Reports must be ... submitted within 30 days of discovery of a reportable event..."

Contrary to the above, the licensee identified in a QA surveillance report issued on April 29, 1988 that the Technical Specification heatup and cooldown limits had been exceeded on February 20 and June 19, 1987, and did not issue a licensee event report within 30 days after this discovery.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. A definite determination that the Technical Specification limit had been exceeded was not provided in the QA Surveillance Report. Plant QA management had mistakenly determined that a Plant QA deficiency (finding) was the appropriate mechanism to initiate the reportability evaluation by the Plant personnel qualified and responsible for that function (e.g. Shift Manager or Plant Technical Compliance group). A Plant Nonconformance Report (NCR) should have been issued in accordance with Plant Procedure (PPM) 1.3.12, "Plant Problems." The purpose of the procedure is to provide instructions for the identification, documentation and disposition of Plant problems, and to ensure that each problem is reviewed for reportability in accordance with regulatory requirements.

The Plant Operations Department, during the initial review of the Plant QA Surveillance Report, also failed to recognize the potential Technical Specification violation and; therefore, the reportability of the situation.

Corrective Steps Taken/Results Achieved

1. On July 5, 1988 an NCR was written by the Plant QA organization which documented the situation that the QA Surveillance Report had identified three examples where the heatup/cooldown rates may have been exceeded. The Plant Technical Compliance Group was aware of the NCR and recognized the need to perform a reportability evaluation. However, due to the workload associated with scheduled commitments, the group was unable to evaluate the situation in a timely manner (the situation was determined to be reportable on August 23, 1988).
2. Licensee Event Report 88-028 is currently being prepared and will be submitted to the NRC in accordance with the requirements of 10CFR50.73.

Corrective Action to be Taken

1. Plant QA Procedure PQA-03, "Conduct of QA Surveillances," will be revised to provide direction to evaluate deficiencies (findings) against PPM 1.3.12 to determine if an NCR is required.
2. Plant Licensing and Assurance Engineers will attend a review of this event and will be informed of their responsibility with regard to problem report initiation in accordance with PPM 1.3.12.
3. A review of the Plant Compliance organization has been completed. Several methods of improving the efficiency of the group have been identified and will be implemented.

Date of Full compliance

1. Corrective Actions 1 and 2 will be completed by November 18, 1988.
2. Corrective Action 3 will be implemented during FY 1989.