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 AUTH.NAME AUTHOR AFFILIATION
 SORENSEN,G.C. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Provides addl response to violations noted in Insp Rept
 50-397/88-02.Plant mod criteria list issued on 880830.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 30, 1988
G02-88-210

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 88-02
ADDITIONAL RESPONSE TO NOTICE OF VIOLATION

Reference: Letter, G02-88-117, GC Sorensen (SS) to NRC
same subject, dated May 18, 1988

In the referenced letter the Supply System committed to develop a criteria list which would define what constitutes a plant modification, and train appropriate personnel on the modification criteria by September 30, 1988. The commitment was made as a result of NRC Inspection Report Notice of Violation 88-02-01 that identified additional foam filters installed inside electrical switchgear. The filters were not an authorized plant modification.

On August 30, 1988 a Plant Modification Criteria List was issued and training was initiated as committed to in the NOV response. However, during the training process, it was determined that additional definition was needed with regard to facilities, systems and components that may require a Plant Modification Record (PMR) prior to performing the work. Accordingly, the Plant Modification Criteria List was revised on September 21, 1988 to include the additional information. Because of the revision to the criteria list, it is now anticipated that the associated training will be complete by October 31, 1988.

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ADDITIONAL RESPONSE TO NOTICE OF VIOLATION

In addition to the commitment to develop the criteria list and provide training, the Supply System also committed to develop an Area/Floor Coordinator training program by June 30, 1988 and provide training on such by August 31, 1988. The intent of the training program is to expand the responsibilities and expectations of the Area/Floor Coordinators to identify unauthorized plant modifications of the type identified in the subject violation.

Although the scoping for this program is complete, the effort took longer than anticipated due to discussions with INPO and visiting several other nuclear utilities for methods on program development. As a result, it is now anticipated that Plant Procedure (PPM) 1.3.19, "Housekeeping" will be revised and the associated training conducted by October 31, 1988.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

JDA/bk

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

