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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

October 24, 1988
G02-88-220

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 88-27
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 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, the violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

Alan Sorensen

G. C. Sorensen, Manager
Regulatory Programs

JDA/bk
Attachments

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

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APPENDIX A

During an NRC inspection conducted on July 8 - August 23, 1988 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented, and maintained covering the activities... recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 states, in part, "The following are typical safety related activities that should be covered by written procedures....6.w. Acts of Nature."

Contrary to the above, as of July 19, 1988, procedures had not been established to provide for the installation and replacement of air intake filters designed to protect the Emergency Diesel Generators in the event of a volcanic ash fallout.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was insufficient follow-through on a commitment made in response to NRC Unresolved Item 87-19-09 (Design concerns regarding ash filters for the diesel generators). Although Plant Procedure (PPM) 4.12.4.5, "Design Basis Ash Fallout" (Revision 3), was issued on June 17, 1988, the commitment to determine 1) the manhours required to install the ash fall filters, and 2) the number of replacement filters needed to sustain the Plant for the expected ash fallout period had not been completed.

Corrective Steps Taken/Results Achieved

1. PPM 4.12.4.5 was revised to better define when and how the filters should be replaced. Major changes include 1) providing storage and staging locations for the filters, and 2) modifying filter changeout requirements.
2. Dedicated filters have been procured and are currently stored on site. In the event of an ash fallout occurrence, these filters will be moved from the storage area to the staging locations specified in PPM 4.12.4.5.

Corrective Action to be Taken

Regarding the reason for the violation (insufficient follow-through on commitments), the Plant Tracking Log (PTL) monitors the processing of external and other commitments by tracking initial entry, document processing and final closeout. A PTL task force has been established to review the accuracy of information in PTL, update the assigned responsibility for each task, and reprioritize. In addition, periodic followup status reviews will be performed to ensure completion of assigned actions.

Date of Full Compliance

PPM 4.12.4.5 (Revision 4) will be issued by October 31, 1988.

