

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

G02-88-229  
November 4, 1988

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 88-33  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated October 6, 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,

  
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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PDR ADOCK 05000397  
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APPENDIX A

During an NRC inspection conducted on September 6-9, 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:

A. Technical Specification 3.3.7.12 states, in part:

"3.3.7.12 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3.7.12-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.2.1 are not exceeded...."

"b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3.7.12-1."

Table 3.3.7.12-1 requires ACTION 112 for less than one Main Plant Vent Release Monitor iodine or particulate channel, and ACTION 113 for less than one Sampler Flow Rate Monitor channel. Table 3.3.7.12-1, Table Notations, states in part:

"ACTION 112 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided that within 4 hours after the channel has been declared inoperable samples are continuously collected with auxiliary sampling equipment as required in Table 4.11-2.

ACTION 113 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided that the flow rate is estimated at least once per 4 hours."

Contrary to the above, from 6:19 p.m. PDT on September 7, 1988, to 4:48 a.m. PDT on September 8, 1988, the main plant vent release monitor was not operable and no effluent sampler flow rate estimations were made nor continuous sample collection conducted, although effluent releases continued via the main plant vent.

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



### Validity of Violation

The Supply System acknowledges the validity of the violation in that procedural requirements were not followed when the Reactor Building HVAC System was secured and the Standby Gas Treatment (SGT) System started. The requirements to declare Reactor Building Effluent Control Rack REA-SR-37 inoperable, and enter the associated Technical Specification Action Statement, were not performed. Sample Rack REA-SR-37 is the isokinetic air flow control rack for effluent monitoring of the main plant vent.

### Corrective Steps Taken/Results Achieved

On October 11, 1988 a test was performed to determine the dynamic flow control characteristics of REA-SR-37 by equalizing the differential pressure across REA-FT-7 (Reactor Exhaust Air Stack Flow Rate Transmitter), simulating decreasing stack flow. The purpose of the test was to collect data to determine if the effluent monitoring system could accurately provide a representative sample during low flow conditions (less than 17,000 cfm). Results of the test indicated that the system will track vent flows to below 2,000 cfm, and maintain isokinetic sampling to below 4,000 cfm.

Accordingly, the sample rack was operable during the event period and representative samples of main plant vent effluents were being obtained.

### Corrective Action to be Taken

Further data collection is planned during the next refueling outage, when actual Reactor Building flows will be in the range of 2,000 to 4,000 cfm, to provide an expanded data base for verification of system operability. The results of the analysis will be used to determine if any additional actions are required.

In the interim, applicable procedures will be modified to notify the Plant Chemistry Department when the Reactor Building HVAC System is secured. The intent of this corrective action is to have the technicians monitor REA-SR-37 indications every four hours during such conditions to verify sampler flow. In addition, a caution sign will be posted on the control panel for the Reactor Building HVAC System as a reminder to notify Chemistry personnel when the system is secured.

### Date of Full Compliance

Although the Supply System is currently in full compliance, interim corrective actions (procedural changes and caution sign) will be completed by December 16, 1988.

Further analysis of REA-SR-37 flow control characteristics will be completed by July 1, 1989.



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