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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

G02-88-249
November 28, 1988

Docket No. 50-397

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

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 88-32
RESPONSE TO NOTICE OF VIOLATION AND DEVIATION

The Washington Public Power Supply System hereby replies to the Notice of Violation and Notice of Deviation contained in your letter dated October 27, 1988. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendices A, B and C (attached).

In Appendix A, the violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance. In Appendix B, the deviation is addressed with an explanation of our position regarding validity, corrective action and date when corrective action will be completed. In Appendix C your concerns on implementation of the process for evaluating vendor information and industry experience, effecting timely corrective action for discrepancies, and assessing questions of safety system operability are addressed.

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NRC INSPECTION REPORT 88-32
RESPONSE TO NOTICE OF VIOLATION AND DEVIATION

The Inspection Report on page 25 states: "The original installation and quality inspections of the HCUs were performed by General Electric personnel. It appeared that the Supply System did not take any responsibility for performing their own quality inspections to ensure that the HCUs were installed properly." The following is the Supply System response to this statement. The Supply System was responsible for overall construction quality, which was implemented through a multi-level program. The installer of the HCUs, General Electric Installation Services and Engineering, was a subcontractor to the site mechanical contractor (WBG) and had first line responsibility for quality. The mechanical contractor was responsible for monitoring the GE IS&E work and quality programs. The mechanical contractor quality programs were overviewed by the site construction manager (Burns & Roe Inc. or Bechtel), who in turn was overviewed by the Supply System. Although the Supply System did not perform first line inspections of the GE IS&E work, quality programs were in place to ensure quality work. Therefore, it is not necessary to perform first line quality inspections in order to be responsible for work.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

JDA:lw

Attachments

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

During an NRC inspection conducted during the period of August 29 to September 30, 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 (1988), the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, is implemented by Section 5.2.1 of Washington Public Power Supply System's Operational Quality Assurance Program Description, Revision 11, which states: "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, Revisions 10 and 11, "Plant Problems" step 1.3.12.5.A.1 and Revision 12, Step 1.3.12.6 require that any person who observes a plant problem shall immediately notify his/her supervisor and initiate a problem deficiency report/nonconformance report.

Contrary to the above requirements:

- (1) As of September 21, 1988, neither a problem deficiency report nor a nonconformance report had been prepared to identify that five safety-related hydraulic control units (HCUs) were missing a lock washer on six hold down bolts, and five additional HCUs had seven loose hold-down bolts. The deficient conditions were identified on January 6, 1988.
- (2) As of September 28, 1988, neither a problem deficiency report nor a nonconformance report had been prepared to identify that HCU 26-11 was misaligned and had installed only two of the four hold down bolts required per design drawings. The deficient conditions were identified on September 26, 1988.

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

Validity of Violation

The Supply System acknowledges the validity of the violation.

The Supply System agrees that deficient plant conditions which do not meet plant design requirements should be documented on a Nonconformance Report (NCR) to ensure that an operability evaluation is performed and documented. Also an NCR receives a more timely review by Plant Management and Plant Operations Staff. Every NCR is reviewed by the Plant Shift Manager (a Licensed Senior Reactor Operator) and by Plant Management in the morning management meeting which is chaired by the Plant Manager or Assistant Plant Manager and attended by Plant Department Managers. Corrective actions specified in the immediate disposition of an NCR, normally have a higher priority than Operational Experience corrective actions.

The cause of the violation is inconsistent implementation of the Plant Problem Procedure which does not require a Plant Deficiency Report (PDR) or Nonconformance Report (NCR) to be written for every plant problem. In fact the procedure relies on individual judgement to determine which problems require a PDR or NCR. The purpose section of the Plant Problems Procedure in paragraph 1.3.12.1 states in part "Plant Problems as applied to this procedure may not include those deficiencies identified and evaluated by other plant procedural means." In the instance of the missing lock washers and loose bolts plant personnel believed that implementation of the External Operating Experience Review Procedure, PPM 1.10.4, was an acceptable alternative to implementing the Plant Problem Procedure by initiating an NCR. In the case of the problems found with the Control Rod Drive (CRD) Hydraulic Control Unit (HCU) for CRD 26-11 an NCR was not issued until September 29, 1988 because the System Engineer intended to add the problem to the original NCR issued on September 23, 1988. The use of the Operating Experience Review process to resolve problems related to actual physical plant problems is not appropriate because the process does not provide a sufficient level of management involvement for operability review.

Corrective Steps Taken/Results Achieved

The missing lock washers have been replaced.

All HCU hold down bolts have been torqued checked. In no case were more than two bolts on any HCU found that moved during the torque verification. Engineering calculations showed that only two bolts per HCU are required to meet seismic design requirements.

Based on Engineering calculations which verified the seismic operability the nonconforming condition of HCU 26-11 was approved for operation. On October 27, 1988 the nonconforming conditions were reworked and HCU 26-11 now meets all design requirements.

The Plant Problems Procedure was revised to formally implement the "potential problem" NCR process. A letter was sent to all plant personnel describing the program changes.

The Plant Licensing and Assurance Engineers were trained on their responsibilities with regard to PDR/NCR initiation in accordance with the Plant Problem Procedure.

Corrective Action to be Taken

A totally new plant problem process is being developed by which actual and potential problems will be documented on a problem evaluation request (PER). Implementation of the PER process removes the responsibility for determining the appropriate Plant Problem process from the individual and transfers it to Plant Management.



The External Operating Experience Review Procedure will be revised to ensure that a PER is initiated for any problem which meets the definition of a plant problem in the Plant Problem Procedure.

Date of Full Compliance

The plant is currently in full compliance and the planned changes to the plant problem process will further improve process implementation.

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

The external Operating Experience Review Procedure will be revised by January 1, 1989.

APPENDIX B

During an NRC inspection conducted during the period of August 29 to September 30, 1988, a deviation from your commitments to the NRC was identified. In accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C (1988), the deviation is listed below:

The Washington Public Power Supply System reply (WPPSS G02-88-025, dated January 29, 1988) to a Notice of Violation issued with NRC inspection report 50-397/87-19 stated in part in Section B, under Date of Full Compliance, that calibration of the diesel generator fuel oil tank level instrumentation will be accomplished by July 20, 1988.

Contrary to the above, at the time of this inspection the new calibration of diesel generator fuel oil tanks DO-TK-1A, DO-TK-1B and DO-TK-2 had not been completed and the tanks had been declared operational.

This is a Deviation from a commitment.

Validity of Deviation

The Supply System acknowledges the validity of the deviation. The Supply System did state in our response to Notice of Violation, Item B (pp 1-2) of Appendix A, of NRC Inspection Report 50-397/87-19 that each Diesel Fuel Oil Storage Tank Level Instrument and Low Level Alarm would be recalibrated by July 20, 1988 and they were not.

The Notice of Violation response stated the operability of each tank is verified daily by direct measurement. Therefore, the failure to complete the calibration of the tank level instruments and low level alarms had no affect on tank operability. Also, contrary to the Notice of Deviation the tank level instruments and low level alarms had not been declared operable at the time of the Inspection (see discussion below).

The Supply System intended to and attempted to meet this commitment. The following is a summary of the action taken to date to meet this commitment. On November 3, 1987, prior to NRC Inspection Report 87-19 being issued, Maintenance Work Requests (MWRs) were initiated to calibrate the tank level instrument and low level alarm for each Diesel Fuel Oil Storage Tank. Also, at this time it was determined that new calibration data for each tank level instrument was required and to obtain this data it would be necessary to transfer large quantities of fuel oil. Between May 17 and May 28, 1988 the calibration data for each Diesel Fuel Oil Storage Tank was obtained by transferring fuel oil from tank to tank and correlating the direct (dipstick) measurement of gallons of fuel in the tank to the tank level instrument output. Using the results of the calibration data,

the three tank level instruments and low level alarms were calibrated by July 7, 1988 prior to the commitment date; however, the instruments and alarms could not be declared operable until the Instrument Setpoint Change Request (ISCR), which included the calibration data, was approved by the Plant Technical Department. The ISCR for the Division 1 and 2 Diesel Fuel Oil Storage Tanks was approved on August 5, 1988. Non-linearity problems were identified in the tank calibration data for the Division 3 Diesel Fuel Oil Storage Tank and the associated ISCR was not approved. The Maintenance Work Requests (MWRs) for the calibration of the Division 1 and 2 Diesel Fuel Oil Storage Tank Level Instruments and Low Level Alarms were completed and the instruments and alarms were declared operable on October 3, 1988. Because of the problems with the calibration data for the Division 3 Diesel Fuel Oil Storage Tank Level Instrument, the instrument and alarm calibrations cannot be completed until an extended outage.

The Plant Technical Staff Compliance Group enters all outstanding NOV commitments into the Plant Tracking Log (PTL) with a due date at least two weeks prior to the commitment date. The requirement to calibrate the Diesel Fuel Oil Storage Tanks was entered into the PTL on February 16, 1988 with a due date of July 6, 1988. A Compliance Engineer weekly reviews an NOV PTL late report to determine commitments due within the next two weeks. In this instance, the Compliance Group did contact the responsible Plant Engineer who stated that the instrument calibrations were complete and all that was needed was for the ISCR to be approved by the Plant Technical Staff. At this time, the Compliance Engineer believed the commitment date would be met. After the due date, the NRC was not notified because the Compliance Engineer thought the instruments were calibrated and it was just a matter of clearing up paper work. Compliance continued to work with the Plant Engineer and later with his Supervisor to get the paper work completed so these items could be formally closed.

Corrective Steps Taken/Results Achieved

The Division 1 and 2 Diesel Fuel Oil Storage Tank Level Instruments and Low Level Alarms were declared operable on October 3, 1988.

The Division 3 Diesel Fuel Oil Storage Tank continues to be verified daily and after any Division 3 Diesel Generator operation by direct measurement.

Corrective Action to be Taken

The Division 3 Diesel Fuel Oil Storage Tank Level Instrument and Low Level Alarm will be recalibrated during the R4 Maintenance and Refueling Outage. The calibration data required to recalibrate the instrument cannot be obtained until an Outage because of the necessity to transfer 13,000 gallons of diesel fuel between tanks using a temporary transfer pumping system.

A program will be initiated whereby the Compliance Engineer will provide each Manager a four week look ahead and overdue list of Compliance commitments due. Both lists will be issued every two weeks and each Manager is responsible to meet or notify Compliance of changes in commitment due dates. If required, the Compliance Group will notify the NRC of commitment changes.

Date of Corrective Action Completion

As stated in the Notice of Violation, the diesel fuel oil supply in the Division 3 Diesel Fuel Oil Storage Tank is verified daily and after any Division 3 Diesel Generator operation by direct measurement and therefore the Plant is currently in full compliance.

The Division 3 Diesel Fuel Oil Storage Tank Level Instrument and Low Level Alarm will be calibrated by August 1, 1989.

The four week look ahead Compliance commitments due and Compliance commitments overdue lists will be implemented by January 9, 1989.

APPENDIX C

Three independent evaluations of the WNP-2 Operating Experience Review (OER) Program have been performed in recent months. First, an annual program effectiveness evaluation was performed by the Supply System in May, 1988, using INPO Good Practice OE-901, Rev. 1, as a guide. Second, INPO performed its annual plant review in June, 1988, which included an evaluation of the OER program. Third and finally, the Supply System performed a QA Audit in July, 1988. As a result of the issues raised by these evaluations or audits, the Supply System developed an OER improvement plan for WNP-2 in August and September, 1988.

In summary, the evaluations concluded that the basic processes in the OER program were adequate; however, timely implementation of corrective action items and review of corrective action effectiveness were noted as areas requiring improvement.

In response to these evaluations, WNP-2 has initiated, and is currently implementing, a plant wide OER action item backlog reduction effort and an OER program improvement effort with the following major aspects:

1. Increased management focus from staff and Line Managers to assure timely and effective execution of the OER program. This includes increased attention to assure that actions taken are effective as well as assuring that actions are proper and complete before closing.
2. Supplemental outside service resources are being applied to OER action items to attain a substantial backlog reduction by July, 1989.
3. Increased focus on assuring effort is applied to tasks most important to safety.
4. Increased use of total plant scheduling for OER tasks with monitoring of performance to schedule.
5. Increased emphasis on establishing firm schedules. especially for the hardware affecting OERs.
6. Improve the periodic monitoring of the timeliness and effectiveness of the OER program and provide periodic reports to Plant and Corporate Management.



Operability/reportability questions which arise as a result of review of industry operating experience are dealt with as an integral part of the OER program by plant policy as implemented in Plant procedure PPM 1.3.12 - Plant Problems. Specifically, if any person, at any time during execution of his responsibilities, becomes aware of a potential or real problem regarding technical adequacy, operability, or reportability related to the OER issue involved, that person is responsible to document the question on an NCR per PPM 1.3.12. Plant Management has recently reemphasized this policy and has specifically emphasized the use of the potential problem NCR as a means of assuring that potential problems are effectively documented and brought to management attention for resolution.

OER effectiveness reviews are of two types at WNP-2. An annual, overall OER program effectiveness assessment is procedurally required by NSAG assessment procedure 1.10.8. The other type of effectiveness assessment would be performed on a selective bases as judged appropriate by NSAG and/or plant management in accordance with plant procedure 1.10.8. The guidelines for selecting an individual OER issue for assessment may typically include; a major issue, an issue important to safety, a "repeat" issue, an issue extending over a relatively long period of time, an issue involving extensive interfacing personnel or requirements, an issue randomly selected to assess effectiveness of the industry experience information review or the effectiveness of implemented corrective action resulting from the review.

In summary, WNP-2 has performed an assessment of its OER program and is implementing corrective actions in response to the identified problems. We believe these actions are appropriate and will significantly improve OER program effectiveness over the next several months of implementation. Finally, it is our intent to establish company wide goals for the timely processing of OER issues. These goals will consider the INPO guidelines (expected to be issued in the near future) relative to this issue.