



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 13, 1989
G02-89-020

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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 88-40
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated January 13, 1989. Our reply, pursuant to the provisions of Section 2.2201, 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

JDA/lw
Attachments

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

890221040-1 s/p.

APPENDIX A

During an NRC inspection conducted on November 14 - December 14, 1988, violations of NRC requirements were identified. In accordance with 10 CFR Part 2, Appendix C, "General Statement of Policy and Procedure for NRC Enforcement Actions," 53 Fed. Reg. 40019 (October 13, 1988), the violations are listed below:

- A. Section 4.7.2 of the WNP-2 Technical Specifications states, in part, that 'Each control room emergency filtration system train shall be demonstrated operable: d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample...meets the laboratory testing criteria of...Regulatory Guide 1.52.'

Section 4.0.2 of the Technical Specification states, in part, that "Each Surveillance Requirement shall be performed within the specified time interval with: a. A maximum allowable extension not to exceed 25% of the surveillance interval.'

Contrary to the above, as of 12:00 am, November 7, 1988, charcoal adsorber train "B" had been operated for 933.9 hours without a sample of the charcoal adsorber having been taken.

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

Validity of Violation

The Supply System acknowledges the validity of the violation.

The Supply System, prior to this Notice of Violation, interpreted Technical Specification 4.7.2.d to mean a charcoal sample had to be obtained and analyzed within 31 days of the filter reaching 720 hours of operation and that the filter was operable during the 31 day sample analysis period. This was thought to be an accurate and literal interpretation of the Technical Specification. The NRC interpretation of Specification 4.7.2.d is that a charcoal sample must be obtained within the next 180 hours of operation (25% of 720 hours) after the filter reaches 720 hours of operation, and that the sample must be analyzed within 31 days after the sample is taken. This difference in the interpretation of Technical Specification 4.7.2.d is the cause of this violation.

Corrective Steps Taken/Results Achieved

A sample was taken from the charcoal filters associated with train B on November 8, 1988 after 933 hours of service. The test showed an efficiency of $99.815 \pm .07\%$. The acceptance criteria is 99% or greater efficiency.

A letter was issued by the Plant Technical Manager to the Plant Operations Manager defining how Technical Specification 4.7.2.d is to be implemented. Briefly the letter states a filter sample should be taken when the 720 service hour time is reached, and that no more than 900 hours (125%) should be accumulated prior to taking the sample.

Corrective Action to be Taken

No further corrective actions are required to be in full compliance; however, the following actions are planned.

Plant Procedure 7.0.0 will be revised to require sampling between 720 and 900 hours of operation.

A Technical Specification change will be submitted to clarify the wording of Technical Specification 4.7.2.d.

Date of Full Compliance

The Supply System is currently in full compliance.

- B. Section 4.0.3 of the WNP-2 Technical Specification states, in part, that "Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation,"

Section 6.8.1 of the Technical Specification requires written procedures to be established and implemented for "The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978." Appendix A of Regulatory Guide 1.33, Revision 2 includes in the listing of procedures which should be provided, "1. Administrative Procedures...b. Authorities and Responsibilities for Safe Operation and Shutdown."

Plant Procedures manual 1.3.1, Standing Orders/Night Orders, Revision 14, states the following in Attachment I, Standing Operating Orders:

- "6. If any surveillance test or other condition indicates that a system is not operable as required by the Technical Specifications, the Shift manager is to begin the action required by the Technical Specifications, (and) log the condition...in a timely manner based on the significance of the condition,"

Contrary to the above, the licensee determined at approximately 11:00 a.m. on November 21, 1988 that the channel calibration Surveillance Requirement for the degraded voltage protection circuit on vital switchgear SM-7 was delinquent, but the Shift Manager did not log the condition or begin the action required by the Technical Specifications (i.e., Section 3.0.3; place the unit in at least STARTUP within 7 hours) until 2:00 p.m.

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

Validity of Violation

The Supply System does not acknowledge the validity of this violation as written. The Shift Manager acted as required by Plant Procedure (PPM) 1.3.1, "Standing Orders/Night Orders," by beginning the action required by the Technical Specifications and logging the condition when it was determined that the relays were not verifiable to be operable at 1400 hours.

In this particular case, Plant Management (not the Shift Manager) assumed the responsibility for determination of operability and developed a plan of action to resolve the issue. As a part of the plan to define the operability status of the SM-7 degraded voltage protection circuit, reviews of procedures, LCOs, plant configuration and testing philosophy were performed.

Concurrently with the reviews performed, the Supply System also pursued other means for completion of testing the circuitry without requiring a Plant Shutdown. The basis for our decision to pursue other means was guidance provided in Generic Letter 87-09. As discussed in the letter, the NRC has recognized that a missed surveillance does not, of itself, cause equipment to be inoperable. Therefore, a shutdown based on a missed surveillance would be an overly conservative action when the equipment could be proven operable upon completion of the missed surveillance. Furthermore, in Generic Letter 87-09 the NRC concluded that 24 hours was an acceptable time limit for completing a missed surveillance when the allowable outage time of the action requirements was less than the 24-hour limit (which was the case of the relays involved).

Validity of Violation (continued)

Continuing with the action plan to resolve the operability issue, the decision was made to involve NRR, Region V and the Senior NRC Resident Inspector in the process. The NRC was made aware of our decision to consider application of the principles of Generic Letter 87-09 to this issue and, after several discussions, it was our belief that a method of relief was available to complete the testing without requiring a shutdown. It is the opinion of the Supply System that these discussions were active and proceeding to a resolution that would not require placing SM-7 in an inoperable condition from the period between 1100 and 1400 hours on November 21, 1988.

However, at 1400 hours it was made clear to Plant Management by the NRC that the principles of Generic Letter 87-09 could not be applied to WNP-2 and, as a result, we were in Technical Specification Section 3.0.3 (absent formal relief). Accordingly, at 1400 hours the Supply System entered 3.0.3 and initiated the required Plant Shutdown. Prior to completing the shutdown, the relays in question were calibrated and Section 3.0.3 was exited.

Although the Supply System does not agree with the validity of this violation, our understanding of the guidance provided in Generic Letter 87-09, and the Waiver of Compliance and Discretionary Enforcement processes is improved. Accordingly, in the future Specification 3.0.3 will be appropriately applied.

Corrective Steps Taken/Results Achieved

On November 21, 1988 Section 3.0.3 was entered. In addition, formal discussions regarding Technical Specification compliance have taken place between the Supply System, Region V and NRR.

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

The Supply System is currently in full compliance.

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RB Samworth - NRC
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NRC Site Inspector - 901A

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PDR ADCK 05000397

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