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SUBJECT: Forwards amended response to notice of violation contained in Insp Rept 50-397/88-40.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

March 22, 1989
G02-89-046

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
AMENDED RESPONSE TO NOTICE OF VIOLATION
88-40-02 (VIOLATION B)

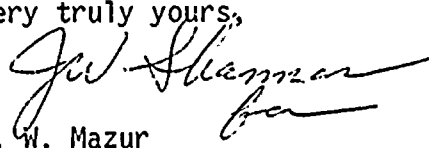
Reference: a) Letter, JB Martin to DW Mazur, "Response
to Notice of Violation - Inspection
Report 88-40", dated March 9, 1989
b) Letter, G02-89-020, GC Sorensen (SS) to NRC,
"NRC Inspection Report 88-40 Response to
Notice of Violation", dated February 13, 1989

The Washington Public Power Supply System hereby submits an amended response to the Notice of Violation 88-40-02 (Violation B) contained in Inspection Report 88-40 dated January 13, 1989. 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.

This amended response is submitted as a result of discussions between Mr. Oxsen of my staff, Mr. Chaffe of Region V NRC, and Mr. Martin's letter of March 9 (reference a). In reviewing our process to properly respond to Notices of Violations, we have identified areas of weakness and are making corrective action changes to that process.

Very truly yours,


D. W. Mazur
Managing Director

JDÀ/bk
Attachment

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

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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:

- B. Section 4.0.3 of the WNP-2 Technical Specifications 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 Specifications 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 (Amended)

The Supply System acknowledges the validity of this violation. The failure to declare the SM-7 undervoltage protection circuitry inoperable while pursuing relief avenues with NRR constitutes non-conservative application of Technical Specification requirement 3.0.3. In this particular case, it should be noted that Senior Plant Management (not the Shift Manager) assumed the responsibility for determination of operability and the development of an action plan to resolve the issue. As part of the action plan to determine the operability status of the SM-7 undervoltage protection circuit, reviews of procedures, LCOs, plant configuration and testing philosophy were performed. As previously stated, the recognition that current, valid surveillance data was not available on portions of the undervoltage circuitry occurred at approximately 1100 hours.

Based upon the belief that NRR concurrence to proceed without complying with paragraph 3.0.3 would be forthcoming, the Supply System inappropriately delayed entry into the 3.0.3. In retrospect, the more appropriate action would have been to apply 3.0.3 at 1100 hours, initiate a plant shutdown, and then continue with the corrective action plan and discussions with the NRC.

Corrective Steps Taken/Results Achieved (Amended)

Following specific indication from Region V that relief from NRR could not proceed without entry into 3.0.3, at 1400 hours on November 21, 1988 the Supply System initiated a plant shutdown. Prior to completing the shutdown, the relays in question were calibrated and the shutdown terminated per paragraph 3.0.3.

The Supply System has also requested the Technical Specification amendment suggested in Generic Letter 87-09, which would allow a 24-hour time limit for completing a missed surveillance when the allowable outage time of the action requirements is less than the 24-hour limit (which was the case of the relays involved).

Corrective Action to be Taken (Amended)

As discussed in the January, 1989 Management Meeting, at the point in time it has been determined that noncompliance with the Technical Specifications exists, the applicable LCO will be entered and the required action statements implemented. This action will be taken independently of any dialogue (e.g. discussion of methods of relief) which may be ongoing between the Supply System and the NRC. In addition, paragraph 3.0.3 will be appropriately applied in the future.

To better understand the processes associated with the available methods of relief from Technical Specification requirements, a guidance document on this subject will be prepared by the Plant Licensing Department.

Date of Full Compliance (Amended)

The Supply System is currently in full compliance and will conservatively apply 3.0.3 when such situations occur.

