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 FULLER,R.E. Washington Public Power Supply System
 POWERS,C.M. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-009-00:on 880529,reactor protection sys actuation
 due to low control rod drive scram air header pressure.
 W/8 ltr.

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10/24/89

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 9 7										PAGE (3) 1 OF 0 9																													
TITLE (4) Reactor Protection System Actuation Due to Low Control Rod Drive Scram Air Header Pressure caused by Inadequate Test Procedure																																																	
EVENT DATE (5) 0 5 2 9 8 8 8 9										LER NUMBER (6) 0 0 9										REPORT DATE (7) 0 0 4 2 8 8 9										OTHER FACILITIES INVOLVED (8) FACILITY NAMES DOCKET NUMBER(S) 0 5 0 0 0																			
OPERATING MODE (9) 5										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																																							
POWER LEVEL (10) 0 0 0										20.402(b)										20.405(c)										50.73(a)(2)(iv)										73.71(b)									
										20.405(a)(1)(i)										50.38(c)(1)										50.73(a)(2)(v)										73.71(c)									
										20.405(a)(1)(ii)										50.38(c)(2)										50.73(a)(2)(vii)										OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
										20.405(a)(1)(iii)										50.73(a)(2)(i)										50.73(a)(2)(viii)(A)																			
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LICENSEE CONTACT FOR THIS LER (12)																																
NAME R.E. Fuller, Compliance Engineer																				TELEPHONE NUMBER AREA CODE 5 1 0 9 3 7 7 1 - 1 2 5 0 1 1												
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) Ext. 2797																																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS																						
SUPPLEMENTAL REPORT EXPECTED (14)																				EXPECTED SUBMISSION DATE (15)										MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)																				NO												

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On March 31, 1989, in a response to a Notice of Violation, it was determined that an event which occurred on May 29, 1988, was reportable in accordance with the requirements of 10 CFR 50.73. On May 29, 1988 at 08:44 hours a full Reactor Protection System (RPS) actuation occurred on Scram Discharge Volume (SDV) high high level during the performance of the Anticipated Transient Without Scram - Alternate Rod Insertion (ATWS-ARI) preoperational test. Another RPS actuation occurred at 09:33 hours, during trouble-shooting activities using the same ATWS-ARI preoperational testing procedures.

A Division I ATWS-ARI preoperational logic test was performed which isolated the normal air supply path to the scram air header. The scram air header depressurized much faster than expected, allowing the SDV vent and drain valves to close and the scram inlet and outlet valves to open, which allowed the water to flow into the SDV. This resulted in an RPS actuation on high high SDV level. To ensure the RPS actuation was not the result of incorrect ATWS-ARI trip logic, trouble-shooting procedures were used to re-perform the Division I ATWS-ARI logic test. A second RPS actuation occurred during the trouble-shooting activities, also on high high SDV level.

The root cause of the first RPS actuation during the ATWS-ARI preoperational testing was a less than adequate preoperational test procedure. The root cause of the second RPS actuation was a less than adequate trouble-shooting procedure.

The immediate corrective action was revision of the preoperational test procedure to require that the scram air header test bypass valve be open for all further testing of the ATWS-ARI Division I trip logic.

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PDR ADQCK 05000397
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Abstract (Continued)

The corrective actions to prevent recurrence include 1) revise Plant procedures to require notation when an Engineered Safety Feature (ESF) or RPS actuation may likely occur, 2) the trouble-shooting procedure will be revised to require an approved written plan when the trouble-shooting activities may cause an ESF actuation, 3) the ATWS-ARI Logic Test surveillance procedure was written to require the scram air header test bypass valve open when performing the procedure, 4) evaluate possible revision of ARI Annunciator Response Procedure to include warning statement that a scram will occur upon receipt of an ATWS-ARI Division I system channel trip, and 5) a preventive maintenance program has been established for the Control Rod Drive (CRD) control air components and Hydraulic Control Units (HCU).

There is no safety significance associated with this event. The plant was shutdown and there was no control rod movement. The ATWS-ARI functional objective remains satisfied.

Plant Conditions

- a) Power Level - 0%
- b) Plant Mode - 5 (Refueling)

Event Description

On March 31, 1989, in accordance with the Supply System response to Notice of Violation "B" of Inspection Report 88-24, the reportability determination of an event which occurred on May 29, 1988, was changed from nonreportable to reportable per the requirements of 10 CFR 50.73. On May 29, 1988 at 08:44 hours a full Reactor Protection System (RPS) actuation occurred due to Scram Discharge Volume (SDV) high high level during the performance of the Anticipated Transient Without Scram - Alternate Rod Insertion (ATWS-ARI) preoperational test. A second RPS actuation occurred at 09:33 hours, during trouble-shooting activities using the same ATWS-ARI preoperational testing procedures. Prior to performing the trouble-shooting activities, the conditions surrounding the first RPS actuation event had been thoroughly discussed and reviewed by the Plant Shift Manager and the Test Director. The Operations personnel did recognize that the scram air header would depressurize as before and were expecting the second RPS actuation; however the Plant trouble-shooting procedure in effect at the time of this event did not require the written trouble-shooting plan to include caution statements and/or specific procedure steps indicating the likelihood of an ESF or RPS actuation when performing the activity.

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At approximately 07:13 hours on May 29, 1988, the ATWS-ARI preoperational test procedure (T.P. 8.3.94) was started. Actuation of the Division I ATWS-ARI system channel trip was initiated in accordance with the procedure at approximately 08:42 hours. The ATWS-ARI test bypass valve CRD-V-28 was closed in accordance with the procedure (See Figure 1). The Division I solenoid valves (inboard valves) CRD-V-24A, -25A, -26A, & -27A were energized and changed position to vent into their respective inboard exhaust paths. These exhaust paths were blocked by the outboard, de-energized and closed, Division II valves. This valve lineup prevented the Control Rod Drive (CRD) scram air header from depressurizing through the ATWS-ARI exhaust paths. CRD-V-27A is a three way valve, which, when energized, blocks off the normal air supply to the CRD scram air header and redirects exhaust flow to the ATWS-ARI exhaust path. Under normal test conditions a bypass valve (CRD-V-28) is opened around CRD-V-27A to maintain the normal air supply to the scram air header. However, as stated above, CRD-V-28 was closed for this test to verify the trip response of the ATWS-ARI system in its normal operational configuration.

In less than one minute after the Division I trip was initiated, the first scram light was observed on the Plant Operator's full core display. At 08:43 hours, all of the CRD scram lights were illuminated on the full core display and the scram air header low pressure alarm had annunciated. The CRD scram inlet and outlet valves are normally open valves held closed by the scram air (header) pressure. A valve position switch is actuated when the valve plug lifts from its seat and both the inlet and outlet scram valve position switches must be activated to illuminate the individual blue CRD scram light. Also, the SDV vent valves (CRD-V-10 and CRD-V-180) and drain valves (CRD-V-11 and CRD-V-181) are normally closed valves held open by the scram air (header) pressure.

With all scram valves open, water flowed to the SDV. The low scram air header pressure allowed the SDV vent and drain valves to close, preventing draining of the SDV. A SDV "not drained" alarm was received followed in rapid succession by a SDV high level CRD block actuation and a full RPS actuation on SDV high high level at 08:44 hours. Plant Operators responded to the event by 1) realigning the ATWS-ARI valves to reestablish the air supply path to the scram air header, 2) placing the high SDV level bypass switch in BYPASS, and 3) resetting the RPS system at 08:45 hours. Since the plant was shutdown with all control rods fully inserted, there was no actual control rod movement associated with this event. The opening of the scram inlet and outlet valves (CRD-V-126 and CRD-V-127, respectively) and closing of the SDV vent and drain valves occurred as designed in response to the low scram air header pressure.

To verify that the first RPS actuation was not the result of an unexpected response of the ATWS-ARI system to a Division I trip, trouble-shooting was performed per the Plant trouble-shooting procedure using the same manipulations as given in the ATWS-ARI preoperational test procedure. The ATWS-ARI Division I was tripped again at 09:32 hours again with CRD-V-28, the test bypass valve, closed. The above event was repeated with a full RPS actuation at 09:33 hours, again due to high high SDV level. As before, the Plant Operators realigned the ATWS-ARI valves to reestablished the air supply path to the scram air header, bypassed the SDV high high level RPS actuation input, and reset the RPS system at 09:34 hours.

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Immediate Corrective Action

In response to both RPS actuations, the operators realigned the ATWS-ARI valves to reestablish the air supply path to the scram air header, bypassed the SDV high high level RPS actuation signal, and reset the RPS system. With actuation of the second Division I ATWS-ARI trip, Plant Technical personnel immediately determined: 1) that the scram air header depressurized faster than anticipated with the air supply shutoff, and 2) the RPS actuation was not the result of an unexpected response of the ATWS-ARI system to a Division I system channel trip. As a result, the preoperational test procedure T.P. 8.3.94 was changed using a procedure deviation to require the CRD-V-28 test bypass valve to be open for all further Division I testing.

Further Evaluation and Corrective ActionA. Further Evaluation

- 1) This event is reportable under 10 CFR 50.73(a)(2)(iv), any event or condition that resulted in automatic actuation of any Engineered Safety Feature (ESF), including the Reactor Protection System (RPS). The ATWS-ARI preoperational procedure T.P. 8.3.94 did not specify in writing a RPS actuation would occur as a result of performance of the test. The second RPS actuation occurred as a result of trouble-shooting performed in accordance with the trouble-shooting procedure which did not require the written trouble-shooting plan for this activity to include caution statements and/or specific procedure steps indicating the likelihood of an ESF or RPS actuation when performing the activity. Thus, the second RPS actuation was not documented prior to its occurrence.
- 2) There were no structures, components, or systems inoperable prior to the event which contributed to the event.
- 3) The root cause of the first RPS actuation during the ATWS-ARI preoperational testing is less than adequate preoperational test procedures which failed to anticipate and plan for a RPS actuation due to scram air header leakage with the air supply shutoff. A contributing cause is less than adequate Plant procedures to provide notation in surveillance and test procedures when an ESF or RPS actuation may likely occur as a result of performing the procedure. The root cause of the second RPS actuation is a less than adequate trouble-shooting procedure which did not require the written plan to include caution statements and/or specific procedure steps indicating the likelihood of an ESF or RPS actuation is expected to occur during the performance of a trouble-shooting activity.
 - a) This preoperational test was the first time the scram air header was isolated from the air supply since plant startup. The expected depressurization rate, based on engineering judgement, was much less than the actual. Therefore, a low scram air header pressure was not expected to occur during the time it would take to perform the Division I ATWS-ARI logic test with the test bypass valve closed.

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- b) The procedures for preparing surveillance and post maintenance/modification test procedures, and the procedure reviewer's procedure do not require the preparer to include caution statements and/or procedure steps that would describe the events that would lead to an ESF or RPS actuation.
- c) The test procedure T.P. 8.3.94 did not provide instructions on how to respond to a low scram air header pressure preceded by a Division I ATWS-ARI trip. Also, there were no statements in the procedure that a RPS actuation would occur. Therefore, the procedure did not cover the situation.
- d) The second RPS actuation was the result of repeating the procedure steps in T.P. 8.3.94 dealing with the Division I ATWS-ARI trip test. This was done to confirm the RPS actuation was due to leakage in the scram air header and shutting off of the air supply as opposed to an unexpected response of the ATWS-ARI trip logic. The trouble-shooting procedure PPM 1.3.42 was used to perform the second confirmatory test. This procedure provides no specific requirement for the written plan to include caution statements and/or specific procedure steps indicating the likelihood of an ESF or a RPS actuation during the performance of trouble-shooting activities.

B. Further Corrective Action

- 1) Plant procedures will be revised to require notation in surveillance and test procedures when an ESF or RPS actuation may likely occur as a result of performing the procedure.
- 2) The trouble-shooting procedure will be revised to require an approved written plan of trouble-shooting activities that may cause an ESF and/or a RPS actuation.
- 3) The ATWS-ARI Logic Test surveillance procedure PPM 8.3.109 was written to require the test bypass valve CRD-V-28 be open prior to testing. As a result, the ATWS-ARI system will not be tested in its normal configuration. But the open bypass valve does not compromise the ability of the test to identify failed components and incorrect system response. Also, a cautionary statement was included to alert operators that a RPS actuation will occur if the bypass valve is left closed during the test.
- 4) Revision of the ARI Initiated Annunciator Response Procedure (PPM 4.603.A-3.1) will be evaluated for possible inclusion of a warning statement to alert Plant operators that an ATWS-ARI Division I system channel trip will result in a scram.
- 5) A preventive maintenance program had been established prior to the event for the CRD control air components and HCUs. It is expected that this program will result in reduced air leakage in the CRD scram air header.

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Safety Significance

There is no safety significance associated with this event. The scram air header leakage does not pose a safety threat to plant operation. The plant was shutdown and there was no control rod movement. The ATWS-ARI functional objective remains satisfied with leaks in the scram air header. The RPS actuation from high high scram discharge volume water level occurred as designed. Therefore, this event posed no threat to the health and safety of the public or plant personnel.

Similar Events

There are no similar events.

EIIS InformationText ReferenceEIIS Reference

	<u>System</u>	<u>Component</u>
Control Rod Drive System (Scram Discharge Volume High Level Alarm)	AA	LA
Control Rod Drive System (Scram Discharge Volume High High Level Alarm)	AA	LA
Control Rod Drive System (Scram Discharge Volume)	AA	
Control Rod Drive System (Scram Discharge Volume Vent Valve CRD-V-10)	AA	VTV
Control Rod Drive System (Scram Discharge Volume Vent Valve CRD-V-180)	AA	VTV
Control Rod Drive System (Scram Discharge Volume Drain Valve CRD-V-11)	AA	LOV
Control Rod Drive System (Scram Discharge Volume Drain Valve CRD-V-181)	AA	LOV
Control Rod Drive System (Scram Discharge Volume Bypass Switch)	AA	HS
Control Rod Drive System (Scram Air Header Low Pressure Alarm)	AA	PA
Control Rod Drive System (Alternate Rod Insertion System Bypass Solenoid Valve CRD-V-28)	AA	TV

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EIIS INFORMATION (Continued)Text ReferenceEIIS Reference

	<u>System</u>	<u>Component</u>
Control Rod Drive System (Alternate Rod Insertion 3-Way Solenoid Block and Vent Valve CRD-V-27A)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-27B)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-24A)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-24B)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-25A)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-25B)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-26A)	AA	PSV
Control Rod Drive System (Alternate Rod Insertion Solenoid Vent Valve CRD-V-26B)	AA	PSV
Control Rod Drive System (Block Valve CRD-V-94)	AA	V
Control Rod Drive System (Scram Air Header Low Pressure Transmitter)	AA	PT
Control Rod Drive System (Scram Air Header Low Pressure Annunciator)	AA	ANN
Control Rod Drive System (Scram Inlet Valves 185 each CRD-V-126)	AA	V
Control Rod Drive System (Scram Outlet Valves 185 each CRD-V-127)	AA	V
Control Rod Drive System (Solenoid Pilot Valves 185 each CRD-SPV-117)	AA	PSV

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EIIS Information (Continued)Text ReferenceEIIS Reference

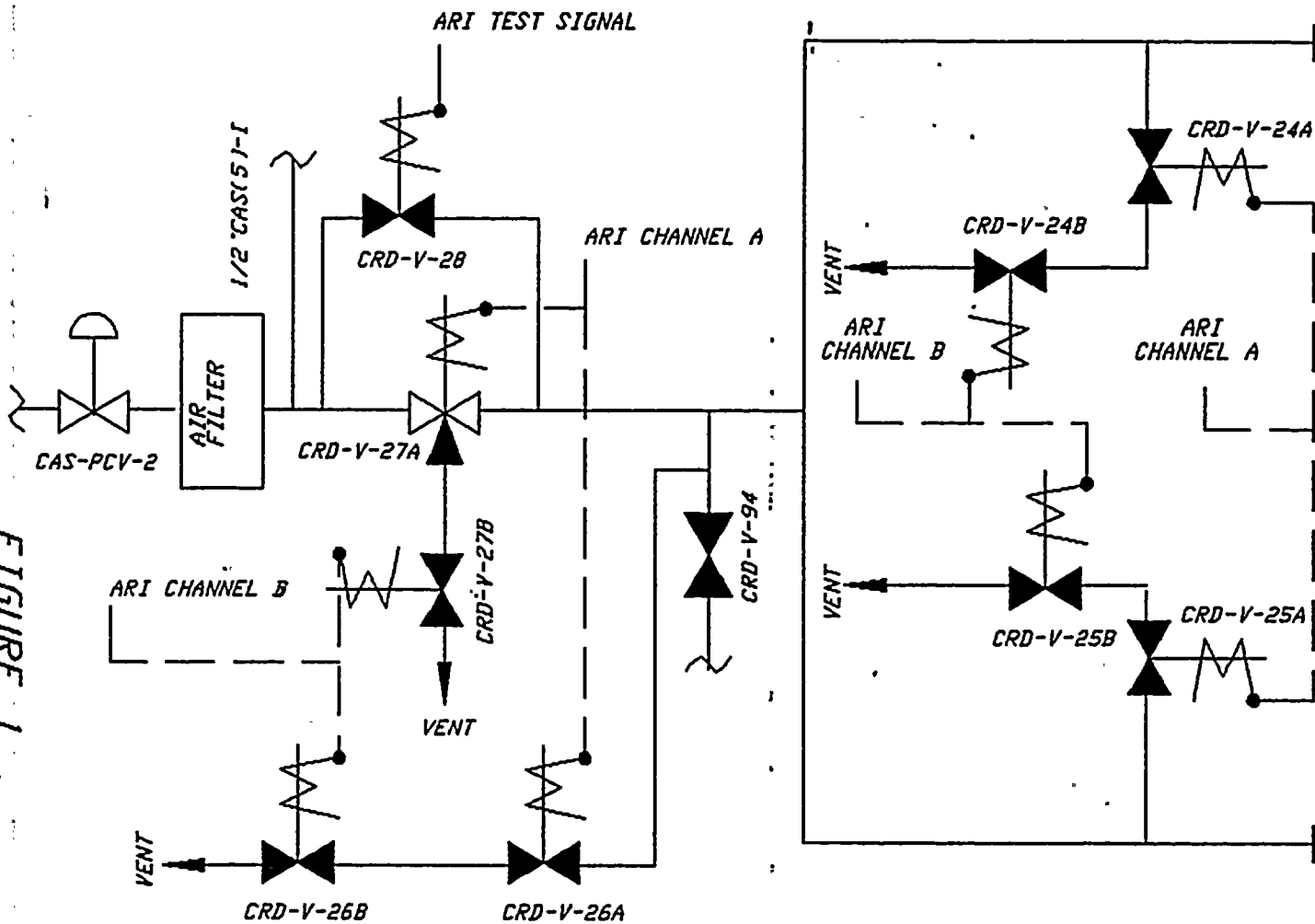
	<u>System</u>	<u>Component</u>
Control Rod Drive System (Solenoid Pilot Valves 185 each CRD-SPV-118)	AA	PSV
Instrument Air Supply (Pressure Control Valve CAS-PCV-2)	LD	PCV
Instrument Air Supply (Air Filter to Scram Air Header)	LD	FLT

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

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NOTE: PARTIAL REPRESENTATION OF CONTROL AIR SYSTEM AND CONTROL ROD DRIVE SYSTEM

FIGURE 1

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

Docket No. 50-397

April 28, 1989

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 89-009

Dear Sir:

Transmitted herewith is Licensee Event Report No. 89-009 for the WNP-2 Plant. This report is submitted in response to a commitment made by the Supply System in our response to Notice of Violation "B" in Inspection Report 88-24. The commitment is to report an RPS actuation which occurred on May 29, 1988 and was not previously reported per the requirements of 10CFR50.73. The report discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Very truly yours,

C.M. Powers

C.M. Powers (M/D 927M)
WNP-2 Plant Manager

CMP:lg

Enclosure:
Licensee Event Report No. 89-009

cc: Mr. John B. Martin, NRC - Region V
Mr. C.J. Bosted, NRC Site (M/D 901A)
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