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 50-397/89-04.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 26, 1989
G02-89-071

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 89-04
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated March 27, 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, each violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,


G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

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 January 9 - February 7, 1989, violations of NRC requirements were identified. In accordance with 10CFR 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. The WNP-2 Technical Specifications, Section 3.8.1.1, require that three separate and independent diesel generators be OPERABLE.

The Technical Specifications, Section 4.8.1.1.2, state in part: "Each of the above required diesel generators shall be demonstrated OPERABLE:...e. At least once per 18 months during shutdown, by:...7. Verifying that all automatic diesel generator trips are automatically bypassed upon loss of voltage on the emergency bus concurrent with an ECCS actuation signal except:

"(b) For Division 3, engine overspeed, generator differential current and emergency manual stop."

Contrary to the above:

1. The incomplete starting sequence trip was not verified to be bypassed when the Division 3 diesel generator was tested per Plant Procedures Manual (PPM) 7.4.8.1.1.2.8, Revision 2, on April 28, 1987 and May 16, 1988.
2. The licensee determined on March 3, 1989 that surveillance performed on the above dates had verified opening of only one of three relay contact pairs which must function to bypass diesel generator trips.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The NRC is correct in its assessment that 1) the incomplete starting sequence trip was not verified to be bypassed when the Division 3 Diesel Generator (DG-3) was tested per the Technical Specification surveillance procedure, and 2) the procedure verified opening of only one of three relay contact pairs which function to bypass Diesel Generator trips.

On December 1, 1988 a Technical Specification Amendment Request was submitted to the NRC so that the Technical Specifications would be consistent with the design of the automatic bypass function of the diesel generator trips. Discussions of the issue at that time focused on 1) current plant configuration, 2) function of the incomplete start sequence feature, and 3) modifying the Technical Specifications to match the design of the system. As a result, Supply System personnel did not followup on the issue of noncompliance with the Technical Specifications as written.

Regarding the bypassing of other diesel generator trips issue, the Supply System interpreted Technical Specification 4.8.1.1.2.e.7 as requiring testing of the bypass function, not that each trip is bypassed. As a result of that interpretation, it was determined that the surveillance program was adequate in that the "bypass function" was verified to be operable (verification of the bypass function was accomplished by pushing a test button on Temperature Switch DCW-TS-4). Because the temperature switch is bypassed on an ECCS signal, it was felt that the requirements of the Technical Specifications were satisfied and, as a result, DG-3 was operable.

In addition, although only one of three contacts was actually verified to be operable by surveillance, it was felt that the relay was operable due to its design. The relay is an HFA relay and it would have been highly unlikely that only one set of contacts would operate and the others not.

However, at the point in time it was determined that the DG-3 incomplete starting sequence trip was not verified to be bypassed as required by the Technical Specifications, the appropriate LCO should have been entered and the appropriate actions taken.

Corrective Steps Taken/Results Achieved

- 1) On February 1, 1989 a request was submitted to the NRC for waiver of compliance from the Technical Specification surveillance requirements applicable to the Division 3 incomplete start sequence bypass verification until the changes requested above could be granted. On February 2, 1989 the NRC granted the waiver of compliance.
- 2) On February 2, 1989 a functional test of the test button associated with Temperature Switch DCW-TS-4 was successfully performed.
- 3) On February 3, 1989 a temporary procedure was successfully completed which verified operation of the remaining contacts on the DG-3 bypass relay.
- 4) On March 30, 1989 the Supply System received Amendment No. 66 to the Operating License which deleted the requirement to verify bypassing of the DG-3 incomplete start sequence trip.
- 5) As discussed in our amended response to NOV 88-40-02, 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.

Corrective Action to be Taken

- 1) Plant Procedure (PPM) 7.4.8.1.1.2.8, "HPCS Diesel Generator LOCA Test", is currently in the process of being revised to require testing of all contacts on the DG-3 bypass relay.
- 2) A process is currently being considered to review Technical Specification requirements and associated surveillance procedures for accuracy and consistency.

Date of Full Compliance

- 1) Although the Supply System is currently in full compliance, PPM 7.4.8.1.1.2.8 will be issued by May 5, 1989.
- 2) A decision on the Technical Specification review process is expected to be made by August 31, 1989.

- B. Section 4.0.3 of the WNP-2 Technical Specifications states 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 3.8.1.1 of the Technical Specifications, in ACTION Statement c., states that with DG-3 inoperable, action shall be taken to demonstrate the OPERABILITY of remaining A.C. sources, and that the high pressure core spray (HPCS) system shall be declared inoperable unless DG-3 is restored to OPERABLE status within 72 hours.

Contrary to the above, the licensee determined in November 1988 that required verification of the incomplete start sequence trip bypass for DG-3 had not been performed as specified in the Technical Specifications, as set forth in item A. above, and did not take the actions specified.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. Had DG-3 been declared inoperable, this violation would not have occurred because the applicable LCO would have been entered and the appropriate actions taken (see response to Violation A).

Corrective Steps Taken/Results Achieved

As discussed in the response to Violation A, at the point in time that it has been determined that noncompliance with the Technical Specifications exists, the applicable LCO will be entered and the required action statements implemented.

As a result of discussions with the NRC, the Supply System also has an increased level of understanding with regard to Technical Specification compliance.

Corrective Action to be Taken

No further corrective action is planned for this violation.

Date of Full Compliance

The Supply System is currently in full compliance.

- C. 10 CFR 50.73 (a) states in part: "(1) The holder of an operating license for a nuclear power plant (licensee) shall submit a License Event Report (LER) for any event of the type described...within 30 days after the discovery of the event.... (2) The licensee shall report:...(i)(B) any operation or condition prohibited by the plant's Technical Specifications...."

Contrary to the above, the licensee determined in 1988, as described in a letter submitted to the NRC on December 2, 1988 that a Division 3 diesel generator trip bypass verification had not been performed as required by the Technical Specifications, and did not issue a license event report within 30 days after this determination.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. If DG-3 had been declared inoperable, this violation would not have occurred because the applicable LCO would have been entered and the appropriate actions taken (See response to Violation A), including the writing of an LER.

Corrective Steps Taken/Results Achieved

No immediate corrective actions were taken with regard to this violation.

Corrective Steps to be Taken

A Licensee Event Report will be prepared and submitted to the NRC.

Date of Full Compliance

The LER will be submitted to the NRC by May 19, 1989 (30 days from Plant Operating Committee approval of this NOV response).

