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 50-397/89-13.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 28, 1989  
G02-89-129

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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Gentlemen:

Subject: NUCLEAR PLANT NO. 2  
LICENSE NO. NPF-21  
NRC INSPECTION REPORT 89-13  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 28, 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 April 17 - June 3, 1989, violations of NRC requirements were identified. In accordance with the 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. 10 CFR 20.203(b) states in part: "Each radiation area shall be conspicuously posted...."

Technical Specification 6.8.1 states, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

"k. Health Physics/Chemistry Support Program"

Health Physics/Chemistry Support Programs procedure PPM 1.11.11, "Entry Into, Conduct In, and Exit From Radiologically Controlled Areas," states in section 1.11.11.3.A that "All work performed in a radiologically controlled area shall be performed using a Radiation Work Permit (RWP)." Section 1.11.11.3.B states that "Health Physics personnel shall post all radiologically controlled areas in accordance with PPM 11.2.7.1, 'Area Posting'".

Health Physics procedure 11.2.7.1, "Area Posting," section 11.2.7.1.5.A.3, states in part, "Barrier the perimeter of the radiation area at approximately waist height (normally)."

Contrary to the above, on May 16, a barrier was not installed across the entry to the reactor water cleanup (RWCU) heat exchanger room, which was a radiation area, and a worker who was not authorized by an RWP to be in the radiation area was allowed free access into this area.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. Although the radiological posting was visible, it was not adequately posted to make the Contractor Maintenance worker aware of the radiation boundary. The reasons for the violations are:

- 1) The Contractor Maintenance worker's attention was directed toward supporting the work ongoing in the Reactor Water Cleanup (RWCU) Heat Exchanger Room. As a result, he did not recognize that he had entered a radiation area when he passed through the gate opening. The gate was open approximately four feet to allow for entry/exit during work in the RWCU Heat Exchanger Room. The worker entered into the alcove at the entrance to the room.



- 2) The Health Physics (HP) Technician's attention was directed toward those persons entering and exiting the room, and controlling significant exposures. The HP Technician assumed that the worker (who was working as the outside man for the job) had signed on to the appropriate Radiation Work Permit (RWP).

In response to NOV 89-09-02, the Suply System committed to provide enhanced posting of certain radiological controlled areas. The efforts associated with this commitment were directed toward high traffic areas where the potential existed for an access barrier to be left down after entry. In this particular case, the posting of the RWCU Heat Exchanger Room was evaluated and determined to be adequate because the room is in a low traffic area and the door is normally locked.

#### Corrective Steps Taken/Results Achieved

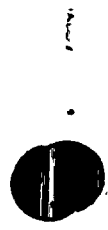
- 1) All Contractor Boilermakers (including the worker involved) were instructed to be aware of radiation area postings and of the need to be signed-in on an appropriate RWP.
- 2) The HP Technician involved was counselled on the need to maintain a high level of awareness of HP requirements at all times.
- 3) The radiation barrier posting for the RWCU Heat Exchanger Room was removed from the accordion-style gate at the entrance to the room, and placed on a rope at head height in front of the gate. This will eliminate the need for the barrier/posting to be moved aside during entry to the room; therefore, assuring that the Radiation Area is conspicuously posted and clearly demarcated.

#### Corrective Action to be Taken

No further corrective action is planned.

#### Date of Full Compliance

The Supply System is currently in full compliance.



- B. 10 CFR 50.72(b)(2) stated in part: "...the licensee shall notify the NRC as soon as practical and in all cases, within four hours of...(1) Any event, found while the reactor is shut down, that, had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principal safety barriers, being seriously degraded...."

Contrary to the above, during testing of the high pressure core spray (HPCS) system conducted on May 12, 1989 during the annual refueling outage, a failed socket weld on a high point vent caused a non isolable leak to exist between the wetwell of the primary containment and the reactor building. This loss of primary containment integrity was discovered at 3:15 a.m. and was not reported until 12:05 p.m.

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

#### Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation is that Plant personnel did not properly evaluate the four-hour reportable requirements of 10CFR50.72 for this event.

#### Corrective Steps Taken/Results Achieved

- 1). On May 12, 1989 at 1205 hours the NRC was verbally notified of the event. As required by 10CFR50.73, an LER (89-015) was prepared and submitted to the NRC on June 8, 1989.
- 2). A representative of the Compliance Group now attends Management Review Committee (MRC) meetings on a daily basis. The purpose of MRC is to provide initial assessment, assignment of priority and allocation of resources for each Problem Evaluation Request (PER). The function of the Compliance representative at the MRC meeting is to review those PERs and provide input on reportability.

#### Corrective Action to Be Taken

Training briefings on reportability/compliance issues will be presented to Plant Operators and Shift Technical Advisors during requalification training.

#### Date of Full Compliance

Although the Supply System is currently in full compliance, the training briefings will commence with Requalification Cycle 89-05 (July 31 - September 2, 1989).

- C. 10 CFR 50.73(a) states in part: "(1) The holder of an operating license...shall submit a Licensee Event Report (LER)...within 30 days after the discovery of the event....(2) The licensee shall report:...(v) Any event or condition that alone could have prevented the fulfillment of the safety function of...systems that are needed to...(A) Shut down the reactor and maintain it in a safe condition;...or (D) Mitigate the consequences of an accident."

Contrary to the above, the licensee failed to report within 30 days, and had not reported as of June 12, 1989 an event that occurred on February 10, 1989, in which inoperability of the suction valve from the suppression pool to the high pressure core spray (HPCS) system could have prevented the HPCS system from performing its safety function.

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

#### Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for this violation is a difference in the interpretation of the regulation between the Supply System and the Commission.

Following the failure of HPCS-V-15 to fully close, a formal reportability evaluation was performed which considered several criteria including 10CFR50.73(a)(2)(v) and 10CFR Part 21. This evaluation concluded that the HPCS system was operable and capable of meeting its safety functions because the system was lined up to the Condensate Storage Tank. As a result, the system was capable of maintaining vessel inventory for a sufficient period of time to allow for compensatory operator actions such as manually opening HPCS-V-15. Accordingly, it was our position that this was not a condition which alone could have prevented the fulfillment of a safety system to mitigate the consequences of an accident.

The failure of HPCS-V-15 was, however, determined to be reportable under 10CFR Part 21. The NRC was formally notified of this determination on April 26, 1989.

We also examined our process by which reportability evaluations are performed, and the process was determined to be adequate.

#### Corrective Steps Taken/Results Achieved

There were no immediate corrective actions taken for this violation.

#### Corrective Action to be Taken

- 1) A Licensee Event Report will be prepared and submitted to the NRC.
- 2) The application of regulation 10CFR50.73(a)(2)(v), as it applies to single-train systems, will be discussed during Licensed Operator Requalification Training.

#### Date of Full Compliance

- 1) The LER will be submitted to the NRC by August 25, 1989 (30 days from Plant Operating committee approval of this NOV response).
- 2) Discussions on the application of 10CFR50.73(a)(2)(v) will be held during Requalification Cycle 89-06 (September 4 - October 6, 1989).



