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ACCESSION NBR:8908280312 DOC.DATE: 89/08/21 NOTARIZED: NO DOCKET #
 FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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SUBJECT: Responds to NRC 890720 ltr re violations noted in Insp Rept
 50-397/89-06. Corrective actions: Tech Specs requirement met.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 21, 1989
G02-89-143

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 89-06
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated July 20, 1989. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A.

In Appendix A, each violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance. Comments on the principal concerns and programmatic weaknesses identified in the transmittal letter to the subject inspection report will be addressed in our response to the SALP Report.

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 from March 27 through April 7, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10CFR Part 2, Appendix C (1988), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion III requires that measures be established to assure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2 and as specified in the license application, are correctly translated into specifications, drawings, procedures and instructions. Section 50.2 provides that the design basis includes "...specific values or ranges of values chosen for controlling parameters as reference bounds for design."

Contrary to the above, on December 13, 1983, an incorrect engineering calculation was issued, which defined values of reference bounds that were subsequently incorporated into Technical Specification Surveillance Procedure 7.4.5.1.8. This resulted in incorrect acceptance criteria of 122 psig minimum discharge pressure at 7450 gpm flow at the discharge of the Residual Heat Removal System, whereas the actual value should have been 130 psig.

This is a Severity Level IV violation (Supplement 1).

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation appears to be that incorrect data was used to determine Residual Heat Removal (RHR) pump performance characteristics during the calculation.

The calculation in question was performed during initial Plant Startup. Since that time Supply System program changes require a more rigorous review of each calculation including the methodology used. The Supply System internal SSFI program includes a review of each Technical Specification, including the Basis. It is expected that future SSFIs will identify similar problems if they exist.

Corrective Steps Taken/Results Achieved

- 1) The pump discharge pressures were re-calculated to meet the Technical Specification requirement of 26 psid.
- 2) During the recent Maintenance and Refueling Outage, flow/pressure combinations were confirmed by a field test of the systems.



- 3) Applicable surveillance procedures were revised accordingly.
- 4) The results of all previous surveillances were reviewed against the new acceptance criteria and all met the new criteria.

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

The Supply System is currently in full compliance.

- B. 10CFR Part 50 Appendix B, Criterion V requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

WNP-2 installation drawing D0-502-1 specified the required location of pipe support D0-918 for an emergency diesel generator fuel oil drain system; WNP-2 installation drawing DSA-4806-1 similarly specified the required locations of pipe supports DSA-4806-12 and -13 for the diesel starting air system.

WNP-2 procedure 10.2.29, Revision 2, part 10.2.29.5.E specifies an installation tolerance of 2 inches for specified pipe support locations.

Contrary to the above, on May 8, 1989 pipe support D0-918 was installed and accepted by craft personnel at a location 3-1/4 to 5 inches from the location specified on drawing D0-502-1. Pipe supports DSA-4806-12 and -13 were installed 8 and 7 inches, respectively, from the specified locations.

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

Validity of Violation.

The Supply System acknowledges the validity of this violation. Pipe supports DSA-4806-12 and DSA-4806-13 were installed within allowable tolerances as shown on the Hanger Sketch. Both pipe supports were added to existing supports and were simple designs consisting of a short piece of angle steel and a U-bolt. Therefore, there was no real location problem with the installation of these supports. The violation stems from the location dimensions of the hangers with respect to the pipe as shown on the associated piping isometric. Pipe supports DSA-4806-12 and DSA-4806-13 were part of a Plant Modification which included a new pipe line. The Field Engineer is responsible for coordinating as-built problems using the Field Change Request process, as was done when the Supply System was informed of the discrepancy.

Support D0-918 was mislocated during installation by a contractor field engineer due to an incorrect measurement.

The work practice for QC inspection of ASME Section XI pipe supports has been to rely on the inspection requirements of the work package rather than Inspection Planning Reports (IPRs). A specific QC inspection for location and orientation was not typically included in the required work package QC inspections.

Corrective Steps Taken/Results Achieved

- 1) Pipe supports DSA-4806-12/13 and D0-918 were evaluated by Engineering and determined to be acceptable. This review and subsequent documentation for drawing revision was included in Field Change Requests 85-0093-1-05 and 86-0330-0-13.
- 2) Outstanding Section XI Maintenance Work Request (MWR) packages have been reviewed by QC to determine the need for incorporation of Inspection Planning Reports M-103 and M-109 when applicable.

Corrective Action to be Taken

- 1) Improvements can be made in the identification and method of verifying applicable piping and support location, orientation, etc., in the work instructions to the craft. A review of Plant Procedures will be performed to determine the most effective method of improvement.
- 2) A review of pre-approved Inspection Planning Reports (IPRs) dealing with piping and support orientation and location will be completed to confirm that adequate detail exists for performing QC inspections. Revision will be made if appropriate. Future MWR packages involving location and orientation of piping and supports will include these IPRs.

Date of Full Compliance

The Supply System is currently in full compliance.

The review of Plant Procedures and the IPRs will be completed by October 1, 1989.

- C. 10 CFR Part 50, Appendix B, Criterion VI requires that "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed. Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval unless the applicant designates another responsible organization"

Page II-4 of the WPPSS Operational Quality Assurance Program Description (WPPSS-QA-004), Revision 9, commits that "The Supply System will implement the Regulatory Position of Regulatory Guide 1.33, Rev. 2 (February 1978)". The Regulatory Position of RG-1.33 provides that "The overall quality assurance program requirements for the operation phase that are included in ANSI-18.7-1976/ANS-3.2 are acceptable to the NRC staff and provide an adequate basis for complying with the quality assurance program requirements of Appendix B to 10 CFR 50..."

Contrary to the above, as identified during the inspection period May 8 - 26, 1989, the above requirements were not fully incorporated into WNP-2 procedure PPM-1.3.7, "Maintenance Work Request", nor were the requirements adequately implemented, for the following work and documentation then in progress:

1. ANSI N18.7, Part 5.2.15, provides that document control measures shall provide for identification of individuals or organizations responsible for reviewing and approving documents and revisions thereto, and ascertaining that proper documents are being used.

Document control procedures did not identify individuals/approvals for revisions being made under all circumstances, i.e., for MWRs AT8858 through AT8861 (electrical switch replacement work on Target Rock valve operators), the Maintenance Engineer responsible for work made minor revisions to work instructions of the MWRs without written concurrence by original reviewers/approvers, i.e. Quality Control and the originating department (Plant Technical). For MWR AS-0045 (Maintenance on DG Engines 1B1 and 1B2), the Operability Check Sheet of the MWR had a retest added as a result of the new MWR step 15, without evidence of QC rereview.

2. ANSI N18.7, Part 5.3.2, provides that procedures shall contain a revision number or date.

Revisions to WNP-2 work instructions (a form of work procedure) did not include revision numbers. For example, procedure PPM 2.7.2 (Emergency Standby A.C. Generator), Paragraph C, step 16.d, was changed with an undated informal adhesive note; also, for MWR AS-0045 (Maintenance on DG Engines 1B1 and 1B2), the Operability Check Sheet of the MWR had a retest added as a result of new MWR step 15 without a revision number or date indicated for the change.

3. ANSI N18.7, Part 5.3.5, provides that applicable sections of the related documents shall be referenced in the procedure.

Work Requests MWRs AU9988, AT7644, AS0045, AS0112, AT4377 and AT4378 invoked related procedures without identification of applicable sections.

4. ANSI N18.7, Part 5.2.1, provides that if documentation of an action is required, the necessary data shall be recorded as the task is performed.

Administrative procedures did not define when tasks performed should be documented. The "work performed" section of certain work instructions were documented after the jobs had been completed, e.g., installation work performed on valve RHR-RV-1B (MWR AU9988), and quality control inspection of testing of diesel generator fuel oil drain piping (MWR AT8496) and service water valve SW-V-12B (MWR AT7644).

This is a Severity Level IV violation (Supplement I)

Validity of Violation

The Supply System acknowledges the validity of this violation in that the existing work control process can be improved.

It is a requirement of PPM 1.3.7 "Maintenance Work Request" that changes to work instruction of MWRs be reviewed and approved by QC prior to implementation. Changes are also allowed to be made with the concurrence of the originating organization. The incidents cited in Item 1 of this violation are performance related in that the individual failed to obtain concurrence from QC. Concurrence with the change was obtained prior to implementation verbally from Plant Technical (the originating organization.) With regard to the procedure change by an informal adhesive note (Item 2), the WNP-2 position is that this was not a procedure change because the intent of the procedure was not changed and the different hold points were an amplification of instructions with the same end result. The issue of referencing procedures instead of procedure sections is acknowledged and considered a work practice issue. The process is currently structured to provide some limited flexibility in the areas of work performance and documentation. As a result, work instructions do not require the same level of control, including provisions for revision numbers and dates, completion of documentation between steps, etc. that is required of formal, approved procedures.

The Supply System does not acknowledge that the "procedural requirements" of ANSI 18.7-1976/ANS-3.2 apply to the MWR process. ANSI 18.7 in paragraph 5.2.7 states that "Maintenance of modification of equipment shall be preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances...." The Supply System maintains hundreds of formal maintenance procedures which are used to maintain or repair Plant equipment. All these procedures meet the requirements of ANSI 18.7 as does PPM 1.3.7 which documents the method by which instructions are provided to skilled maintenance personnel. Paragraph 5.2.7 further states that "skills normally possessed by qualified maintenance personnel may not require detailed step by step delineations in a written procedure." PPM 1.3.7 requires that maintenance personnel document work performed, but the WNP-2 position is that step by step documentation is not an applicable requirement. Further, PPM 1.3.7 adequately addresses the methodology and documentation required to change an approved MWR, and the WNP-2 position is that revision numbers for MWRs are also not an applicable requirement.

Corrective Steps Taken/Results Achieved

The Supply System worked with the team during the inspection and reviewed each specific concern identified in this violation. Based on that review, it was concluded that no unacceptable material condition existed. In addition, the documentation deficiencies identified have been corrected.

Corrective Action to be Taken

- 1) A Plant memorandum will be issued to emphasize the proper method for changing approved MWRs.
- 2) The Supply System is committed to a complete review of its work control process, including any necessary training that may be required. This review is expected to result in changes to the overall process including added rigor in the areas of work instruction clarity, step-by-step work description and sign-off, work package planning, control of changes to the package, etc. Each concern identified in the violation will be addressed in this review process.

Date of Full Compliance

The Plant memorandum will be issued by September 20, 1989.

The review will be completed by November 1, 1989, with formal changes to the program to be completed by January 1, 1990. Interim changes will be made as deemed necessary prior to this date.

- D. 10 CFR Part 50, Appendix B, Criterion XI, provides that testing shall be identified and performed in accordance with written test procedures that include requirements and acceptance limits contained in applicable design documents, provisions for assuring that all prerequisites for the given test have been met, and documentation of test results to assure that test requirements have been satisfied.

Contrary to the above, during the inspection period May 8 - 26, 1989, the above requirements were not implemented for test procedures utilized for PMR 86-332 (pressure testing emergency diesel oil day tank piping). The procedure neither identified nor specified the position of gate valves DO-V-56A, 56B and 56C (located within the test boundary); the test procedure did not identify/specify any of the four new screwed joints in each pipe run; and flanged joints in the pipe runs were not listed in the test data sheets.

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

Validity of Violation

The Supply System acknowledges the validity of this violation.

The failure to identify the position of three gate valves within the test boundary is due to a procedural deficiency. Plant Procedure PPM 8.7.6, "Pneumatic Testing of ASME code Class 2 and 3 Systems" does specify in a prerequisite that specific equipment alignment including valve alignment shall be specified; however, the procedure does not provide or describe an adequate mechanism to implement this prerequisite.

The failure to include threaded connections and flange joints on the test data sheets is due to personnel error. Test data sheets were included in the original ASME Section XI package; however, they were not on the proper revision of the form. A contractor work supervisor inadvertently omitted the information when transferring the information to the correct form.

Corrective Steps Taken/Results Achieved

The three valves within the pressure boundary were verified open by the Test Director prior to and during the test.

The piping during the pneumatic test was inspected to the isometric drawings. All threaded connections were inspected and verified by the ANI/QC during the pneumatic test. Later, additional data sheets were prepared to document this inspection.

In addition, during a subsequent operations test, no leakage was noted.

Corrective Action to be Taken

PPM 8.7.6 will be revised to provide more specific directions on how to specify equipment alignment within the test boundary.

Date of Full Compliance

The Supply System is currently in full compliance.

PPM 8.7.6 will be revised by November 30, 1989.