

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR: 8909050331 DOC. DATE: 89/08/29 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 BOUCHEY, G.D. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 890731 ltr re violations noted in Insp Rept
 50-397/89-17.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

RECIPIENT ID CODE/NAME PD5 PD	COPIES LTTR ENCL 1 1	RECIPIENT ID CODE/NAME SAMWORTH, R	COPIES LTTR ENCL 1 1
INTERNAL: ACRS	2 2	AEOD	1 1
AEOD/DEIIB	1 1	AEOD/TPAD	1 1
DEDRO	1 1	LOIS, ERASMIA	1 1
NRR SHANKMAN, S	1 1	NRR/DEST DIR	1 1
NRR/DLPQ/PEB	1 1	NRR/DOEA DIR 11	1 1
NRR/DREP/EPB 10	1 1	NRR/DREP/RPB 10	2 2
NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
OE LIEBERMAN, J	1 1	OGC/HDS2	1 1
REG FILE 02	1 1	RES MORISSEAU, D	1 1
RGN5 FILE 01	1 1		
EXTERNAL: LPDR	1 1	NRC PDR	1 1
NSIC	1 1		

TOTAL NUMBER OF COPIES REQUIRED: LTTR 26 ENCL 26

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 29, 1989
G02-89-147

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 89-17
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated July 31, 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

IE01
11

8909050331 890829
PDR ADUCK 05000397
Q FDC



APPENDIX A

During an NRC inspection conducted on June 4 - July 9, 1989 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:

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

d. Surveillance and test activities of safety-related equipment."

Contrary to the above, Technical Specification required surveillance procedure 7.4.6.3.4.1 "Surveillance Testing of Reactor Pressure Vessel Excess Flow Check Valves" was not adequately established, implemented or maintained on June 17 and June 18, 1989, in that:

1. The procedure did not specify the upper pressure control limits and the residual heat removal shutdown cooling high pressure trip setpoint was exceeded resulting in an inadvertent engineered safety feature actuation on June 17.
2. The procedure did not specify the valve numbers to be operated which caused the wrong valve to be opened resulting in another engineered safety feature actuation on June 18.
3. The procedure did not specify which control room instruments were taken out of service, resulting in the Control Room Operators controlling system pressure manually using an instrument which was isolated resulting in system pressure exceeding the trip setpoint and another engineered safety feature actuation on June 18.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was a less than adequate procedure for performing excess flow check valve testing.

Corrective Steps Taken/Results Achieved

1. All three events were analyzed as part of a formal incident investigation into a series of 12 Engineered Safety Feature (ESF) actuations which occurred during the recent maintenance and refueling outage.
2. On July 17, 1989 Licensee Event Report (LER) 89-025, which addressed all three events, was submitted to the NRC as required by 10CFR 50.73.

Corrective Action to be Taken

As stated in LER 89-025, Plant Procedure (PPM) 7.4.6.3.4.1, "Excess Flow Check Valve Testing", will be revised to identify the consequences of each instrument removed from service, and to also include specific valve identification.

Date of Full Compliance

PPM 7.4.6.3.4.1 will be revised prior to the next maintenance and refueling outage (March 31, 1990).



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

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33; Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, states in part "The following are...safety related activities that should be covered by written procedures...Access control...including a Radiation Work Permit System."

Plant Procedure Manual (PPM) 1.11.8 "Radiation Work Permit" states in part in Section 1.11.8.3.A "RWPs are required for all work performed in radiologically controlled areas."

PPM 1.11.3 "Health Physics Program" states in part in section 1.11.3.5.F.7: "Conditions that require a radiation work permit include... When the work involves opening a system or piece of equipment which is likely to contain significant quantities of radioactive material." Paragraph 1.11.3.5.I.3 states "It is the responsibility of each individual entering the controlled area to ascertain the protective clothing requirement for the area and to comply with such requirements."

Radiation work Permit 2-89-007, Special Instruction 9, required that "Protective clothing listed is the minimum required for contaminated areas." Instruction 11 stated that "One pair of rubber gloves and cotton liners is required to open internally contaminated systems or components."

Contrary to the above, on July 4, 1989 an instrumentation technician was manipulating valves, opening an internally contaminated system, and connecting test equipment to reactor coolant system components inside a posted radiologically controlled "Contaminated Area" and was not wearing rubber gloves and cotton liners.

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 was lack of attention to detail on the part of the Plant Instrument and Control (I&C) Technician involved.

Corrective Steps Taken/Results Achieved

1. The Channel Functional Test (CFT) was immediately halted and a Plant Health Physics (HP) Technician was dispatched to the work area to perform a complete personnel and area survey. When a contamination-free status had been established, the HP Technician instructed the I&C Technician on the proper radiological requirements for completing the task. The CFT was then completed with continuous HP coverage to ensure that appropriate radiological controls were maintained.

2. The I&C Technician involved was counselled on the importance of adhering to Radiation Work Permit (RWP) requirements, and disciplinary action was taken in accordance with Supply System policy.
3. Peer-Review meetings were conducted (with representation by each Maintenance Shop, HP and the Human Performance Evaluation System Coordinator) to evaluate the event and determine the root cause.
4. A formal report on the Peer-Review Committee conclusions was prepared and circulated to each Maintenance Shop, the Health Physics/Chemistry Department and the General Employee Training (GET) Group to increase personnel sensitivity to radiological control issues. Included in the report were recommendations for enhancing communication between HP and craft personnel, and providing additional training on contamination control.

Corrective Action to be Taken

The HP Support Group will provide, on a periodic basis, trend information to each Maintenance Shop on Radiological Occurrence Reports (RORs) and skin and clothing contamination to allow Maintenance Supervisors to address craft-level radiological control issues.

Date of Full Compliance

The trend information to be provided to the Maintenance Shops will commence September 30, 1989.

