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AUTH.NAME AUTHOR AFFILIATION
MAZUR,D.W. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
MARTIN,J.B. Region 5, Ofc of the Director

SUBJECT: Responds to SALP rept for period June 1988 - May 1989.

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October 16, 1989
Docket No. 50-397
G02-89-183

Mr. J. B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Martin:

Subject: RESPONSE TO WNP-2 SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT - 1989

Reference: Letter, J. B. Martin to D. W. Mazur, SALP, dated July 24, 1989.

The NRC's Systematic Assessment of Licensee Performance (SALP) Report for WNP-2 covering the period June 1, 1988, through May 31, 1989, was forwarded to the Supply System with the referenced letter. Subsequent to receipt of the 1989 SALP report, a meeting between our respective staffs was held at the WNP-2 plant on August 8, 1989, to discuss the NRC assessment of Supply System performance.

During the past year, the Supply System has undertaken a number of significant process and program improvement initiatives, partially in response to the 1988 SALP report. The performance improvements which have been noted are due to these initiatives. It is our intent to build on the successes of the past year, making adjustments in programs as needed to address the issues raised in the current SALP report.

Subsequent to the 1988 SALP report, a tracking system for NRC SALP commitments was established to assist management in tracking the progress of these commitments to completion. Progress on commitments is reviewed on a regular basis by Senior Management to determine if corrective actions are required. Directors of the various organizational components are in attendance at these review meetings and are assigned responsibility to assure that commitments assigned within their directorate are met. Reporting on progress within each directorate is handled through the management chain, with the responsible line manager/supervisor providing feedback up to the director. In addition, an effectiveness review has been established to provide an independent assessment of the effectiveness of our corrective actions in accomplishing their purpose. This system provides feedback to appropriate management as to the effectiveness of their corrective actions. Through the Tracking System and the effectiveness review, management is able to assure timely and effective completion of our improvement programs.

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RESPONSE TO WNP-2 SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT - 1989

The Supply System Fitness for Duty (FFD) program, including random testing in compliance with 10CFR26, will be implemented October 23, 1989. Although the regulations do not require the program to be implemented until January 1, 1990, the Supply System is implementing the program early to test our procedures and processes to assure that any problems are identified and corrected prior to the effective date of the regulation.

Although a response to the SALP report was not required, we have determined that a status report would be appropriate. The attachment provides a brief discussion of actions we have taken or are taking in response to the recommendations in the 1989 SALP report. As in the past, we propose that future status reports be included as a part of the agenda for our quarterly management meeting.

Should you have any questions on the attached information, please contact me.

Very truly yours,

D. W. Mazur
Managing Director (MD 387)

GCS/tlr

Attachment

cc: Mr. C. Eschels, EFSEC
Mr. G. W. Knighton, NRC
Mr. N. S. Reynolds, Bishop, Cook, Purcell & Reynolds
Mr. R. B. Samworth, NRC
Mr. D. L. Williams, BPA (399)
Document Control Desk

STATUS REPORT ON SALP BOARD RECOMMENDATIONS

The 1989 NRC Systematic Assessment of Licensee Performance (SALP) Report No. 50-397/89-16 transmitted on July 24, 1989, identified three issues of principal concern and also identified several specific functional area weaknesses. The following provides a summary of actions taken or being taken to address those issues and weaknesses:

A. Issues of Principal Concern

1) Weakness in Procedure Quality and Administrative Controls

As a part of the 1988 SALP improvement program, the Supply System initiated a procedure Quality Improvement Program. A key part of this program was the establishment of a procedure development group, supervised by a licensed Control Room supervisor. This effort is still in process, with completion scheduled for late 1990. As noted in the current SALP report, this effort has resulted in a significant improvement in the Operations procedures. It is our intent to conduct a similar improvement program for the Health Physics/Chemistry and Maintenance areas. A review of Technical Specification requirements and procedure requirements to assure that all Technical Specification requirements are included in procedures or surveillances will be performed as a part of our Improved Technical Specification program. This review will not just be a "checksheet" to determine that there is a procedure, but will also review the adequacy of the procedures.

The Safety System Functional Inspection (SSFI) on the Low Pressure Core Spray (LPCS) System conducted by the Supply System in 1988 included a review to assure that Technical Specification requirements were included in the appropriate plant procedures and surveillances. A similar review is currently being performed as a part of the SSFI on the AC electrical system. Neither of these two SSFI reviews have identified discrepancies between the Tech Specs and procedures. This review of Tech Spec requirements and procedures will be a part of all future SSFI reviews. These SSFI reviews provide an additional check of the procedures and surveillances against the Technical Specification requirements and the quality of our procedures.

We have recently completed a review of those surveillances that are required prior to initiating a plant mode change. These required surveillances have been included in a procedure to assure that mode changes do not occur without first completing the surveillances. The need to perform this review became apparent when a required surveillance was missed. Prompt action was taken by plant management to perform the above review. There has been no recurrence of this problem.

In response to the 1988 SALP, the maintenance shop management structure was reorganized to provide each shop (i.e., Electrical, I&C, and Mechanical) with an engineering supervisor and a work control supervisor, both reporting to the shop supervisor. The engineering group is primarily responsible for the preparation and review of maintenance procedures and preparation of work packages while the work control supervisor is responsible for implementation of the work packages in conformance with established procedures.

A review of maintenance procedures is being conducted as committed to in our response to the NRC SSOMI. The purpose of this review is to identify deficiencies in maintenance procedures and to improve or add procedures where needed. A major part of the review will be to improve the human factors elements of the procedures. The end product of this activity will be improved work packages for the craftsmen.

2) Inability to Achieve Consistent Adherence to Procedures by Plant Personnel

The completion of the efforts addressed above is expected to have a positive effect on this issue in that procedures will provide clear direction. The procedures will also contain more detail and thus not rely as heavily on the skill of the craftsman. The need to adhere to procedures is addressed in various training sessions and departmental meetings.

In a broader context, the Supply System is currently introducing its "Quality Improvement" program to employees at all levels in the organization. A major thrust of this program is that quality is the responsibility of each individual. The long-term goal is to instill in each employee a sense of pride in performance, seeking to identify problems and make corrections when they first appear.

This issue is one which management recognizes as having no simple solutions. Currently implemented initiatives such as the Problem Evaluation Request (PER), the Peer Review Program, and the Human Performance Evaluation System (HPES) all help in developing an understanding of the root cause of plant events or failures to comply with established procedures. Consistency in procedural compliance depends on not only clarity of procedures and employee training, but also employee attitudes, personal concerns that may impact the employee, etc. Our current efforts are directed toward eliminating as many of these factors as possible and providing good oversight to catch inconsistencies as early as possible.

3) Nonconservative Equipment Operability Determinations by Plant Management

As noted in the August 8 meeting, actions taken by management have resulted in a noticeable improvement in this area even during the SALP period. The PER (Problem Evaluation Request) process initiated earlier this year has provided a vehicle to focus questions on equipment operability and Justifications for Continued Operation (JCO). This, coupled with a heightened sensitivity on the part of management, has resulted in the improvement noted.

Recent experience in this area indicates that we are now taking the conservative position when questions of operability occur. We expect this approach to continue in the future. Plant management is setting the standard for others to follow.

B. Identified Functional Area Weaknesses

1) Radiological Controls

Resolution of effluent monitoring issues and adherence of plant personnel to radiological protection practices:

Status

As a result of concerns related to effluent monitoring, the plant Chemistry group has written procedures which include the LCO statements and action required by chemistry technicians for effluent radiation monitors. The procedure now requires that when entering an action statement requiring chemistry action, the chemistry technician signs an LCO logbook in the main Control Room and also enters actions in the chemistry LCO logbook in the lab. Additionally, the Maintenance and Operations groups have a heightened awareness of the importance of maintaining availability of the effluent monitors.

The Supply System recognizes the need to improve the radiological performance of plant personnel. Trend data illustrates improvement in this area during the past year: the frequency of Radiological Occurrence Reports (RORs) decreased overall and the frequency of events during the RF-89A outage was nearly half that of RF-88A. The frequency of events in the root cause category "Failure to Follow Program Controls" has decreased significantly.

The issue of failure to adhere to radiological protection practices has two facets, one being insufficient training and the other failure to implement the training. To address the first element, upgraded Health Physics training programs have been prepared and are a part of the required training for plant personnel and H. P. staff. At this time, approximately one-third of the plant supervisory staff has completed an advanced radiological training program. The remainder have been scheduled to complete this training by the end of 1989. The "All Crafts Radiation Worker Training" is being upgraded to identify health physics concerns within the nuclear industry as well as specific WNP-2 concerns.

In those cases where employees simply ignore established radiation protection practices, appropriate disciplinary actions escalating up to and including dismissal will be taken in accordance with Supply System policies.

2) Maintenance/Surveillance

Work control practices (use of "vital" maintenance work requests (MWRs), insufficient guidance in MWR work instructions, and control of changes thereto) and the scheduling of surveillance tests.

Status

A number of initiatives have been undertaken to address concerns related to the vital MWR process. These include: limiting a vital MWR to be open no longer than 24 hours except under extraordinary circumstances; increasing management awareness of open vital MWRs through review at the daily Management Review Committee Meetings; and increased review of planned work activities as controlled by procedure. As a result, improvements have been seen in this process with more rapid closure of vital MWRs, elimination of long-term actions on vital MWRs, decreased internal QA concerns with work done on vital MWRs, and greater awareness of activities controlled by this process.

The issue of insufficient guidance in MWR work instructions is being addressed incrementally through increased emphasis by supervision on improved quality and content in each package. There is also a plan for reviewing the entire process for describing and controlling work through the MWR process. This effort will include a comprehensive look at the needs of the plant and the inadequacies and inefficiencies in the existing process and work to improve these conditions. At the end of this process training sessions will be conducted to ensure consistency of understanding and application of the new process. This overall effort should help address the concern for quality packages in the short run as well as develop a process to ensure quality in future packages.

The plant has taken steps in the past year to integrate the clearance order process along with the daily schedule. Management initiatives are underway to further integrate the work control process to integrate the daily work schedule with plant operating conditions and component availability to effect an improved approach to the control of work activities at the plant.

Surveillances critical to continued safe plant operation have been identified separately from the more routine plant surveillances and additional supervisory attention is being applied to these activities. Additional craft supervision is being required in field activities with management's expectations emphasized to each shop supervisor.

3) Engineering/Technical Support

Technical Specification interpretations, technical staff training, and reporting of plant events.

Status

Plant management has a full understanding of the concerns regarding conservative judgements and interpretations. Through their leadership on the Management Review Committee on daily plant problems, they have assumed a more visible role regarding the required conservatism and thoroughness. The plant Technical Compliance staff is being made more accessible to the Operations staff to assist in consistent interpretation and reportability determinations on plant conditions or events.

The Supply System is currently evaluating the Improved Technical Specifications (ITS) prepared by the BWR Owner's Group. We have initiated work on the development of Improved Tech Specs for WNP-2. A major feature of the ITS is the improvement to the Bases section, which makes the basis for the Tech Spec actions clear and eliminates a lot of the interpretation that is required with existing Tech Specs.

The NRC has indicated that it will be able to review Improved Tech Spec submittals for approximately 10 plants per year. The Supply System has indicated an interest in being included in the first group of 10 plants. Assuming this to be the case, our program is geared toward submittal of the Improved Tech Specs to the NRC in the fall of 1990. Revision of the associated procedures will be accomplished in parallel with the NRC review of the Improved Tech Specs. Assuming that the NRC review of the Improved Tech Spec will be completed about one year from submittal, we plan to implement the Improved Tech Specs and revised procedures in late 1991. Included in this process will be a validation and verification effort with the Improved Tech Specs and revised procedures.

A training program for the Plant Technical staff is being developed covering more than two dozen areas critical to effective functioning of the organization. Training modules are being developed and training is being initiated on 10CFR50.59, root cause determination and project management. Modules are planned over this next year for other key processes involving plant modifications, plant problems, maintenance work requests, and testing. These efforts are directed toward more consistent implementation of our important activities.

In addition, the Training department has established a "Technical Support Staff and Manager's Training Program" (TSSM) aimed at improving the technical capability and understanding of all Technical Support staff and managers. This program requires that each Technical Support supervisor or manager identify the type of training required for his/her technical staff in order to perform their defined role in support of WNP-2 and that the required training be accomplished. Currently, approximately 60% of ths effort is complete. Our goal is to complete this effort by January 1991.

4) Safety Assessment/Quality Assurance

Root Cause Program and the Quality of Licensing Submittals

Status

Supply System management is committed to improving plant safety and reliability through effective use of root cause analysis techniques. To be effective, these analyses have to be timely and thorough. A recent organizational change in the Licensing and Assurance Directorate involved combining the Operational Experience Review, Human Performance Evaluation and External Event Analysis groups under a single manager. Also, the Operational Assessment and Engineering Assessments were combined under a single manager. Both of these managers report to the Manager, Nuclear Safety Assurance.

These changes are expected to improve both the timeliness and thoroughness of our root cause analyses by improved communication between those primarily responsible for event assessments and root cause analyses. The timeliness of root cause analyses should also be enhanced due to the fact that the WNP-2 Plant Manager now formally assigns the team members for a Category 1 root cause analysis and establishes major milestone expectations to track completion of the analysis.

The WNP-2 licensing manager meets with the NRC project manager on a quarterly basis to review the quality of licensing submittals and expected future submittals. We believe the continuation of this effort is the most effective means of understanding NRC concerns with these submittals and as such will be requesting more specific NRC feedback at these sessions. In addition, a review will be conducted of recent submittals which required NRC to request further information. The results of this review will allow the licensing manager to determine if additional action is required.