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SUBJECT: Forwards response to NRC 891005 ltr re violation noted in  
 Insp Rept 50-397/89-23 & assessment of issues.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

November 3, 1989  
G02-89-204

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

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21  
NRC INSPECTION REPORT 89-23  
RESPONSE TO NOTICE OF VIOLATION

- Reference: 1) Letter, G02-89-143, G.D. Bouchey (SS) to NRC  
"NRC Inspection Report 89-06", dated August 21, 1989.  
2) Letter, G02-89-202, G.C. Sorensen (SS) to NRC  
"NRC Inspection Reports 89-06 and 89-13", dated  
October 31, 1989  
3) Letter, G02-89-183, D.W. Mazur (SS) to J.B. Martin (NRC)  
"Response to WNP-2 Systematic Assessment of Licensee  
Performance (SALP) Report - 1989", dated October 16, 1989

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated October 5, 1989. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendices A and B (attached).

In Appendix A, the violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance. As requested in the cover letter to the subject Inspection Report, Appendix A also discusses our steps taken, or planned, to ensure improved control of maintenance and surveillance activities. Appendix B provides an assessment of those issues also presented in the cover letter with regard to the Supply System Safety System Functional Inspection (SSFI) of the low pressure core spray system.

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 July 10 - August 23, 1989 a violation of NRC requirements was identified. In accordance with 10CFR Part 2, Appendix C, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violation is listed below:

- A. Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented, and maintained covering... The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 states in paragraph 9.a that "Maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures...."

Plant procedure manual 10.24.12, Revision 4 (dated June 10, 1989), "Instrument Tubing and Fitting Usage Instructions," states in paragraph 10.24.12.4: "Use proper sized wrenches when tightening fittings. Always use a second wrench to hold the connector firmly when tightening, or loosening, the connecting nut." Plant Procedures Manual (PPM) 10.24.12 also states in paragraph 10.24.12.7.c.1 that, when retightening the connectors, "This advance (re-tightening) need only be 10 -20 degrees (less than 1/3 of a hex flat) (past the original position)."

Contrary to the above, on July 20, 1989, following a surveillance test on reactor recirculation instrumentation, a maintenance technician tightened the connectors for a test connection isolation valve using an adjustable wrench on the valve and a properly sized wrench on the connecting nut. He tightened the nut approximately one hex flat.

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 that the technician was not aware of the specific guidance (less than one-third hex flat) in Plant Procedure (PPM) 10.24.12, and he adjusted the connection approximately one hex flat.

In the cover letter to the subject inspection report, it was requested that the Supply System, in addition to the specific responses directed, also discuss the steps taken or planned to ensure improved control of maintenance and surveillance activities. These steps are discussed in the applicable sections of this NOV response.

Corrective Steps Taken/Results Achieved

- 1) This violation was discussed extensively during I&C Department shop meetings to ensure a good understanding regarding Parker-Hannifin tube fitting installation/re-installation methodology.
- 2) With regard to ensuring improved control of maintenance and surveillance activities, the Maintenance shop management structure was reorganized (in response to the 1988 SALP Report) to provide each shop (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. The work control supervisor is responsible for implementation of the work packages in conformance with established procedures. This reorganization was recently implemented (February, 1989) and, as such, has not yet reached its full potential. We will continue to monitor the effectiveness of this arrangement.

A shop practices document was prepared by Plant I&C supervision to outline expected duties of the I&C Technicians during the performance of surveillances. All Plant I&C Technicians were trained on this document. Current plans are to prepare shop practice documents for the Maintenance Work Request (MWR) and Preventive Maintenance (PM) processes, and provide training on such.

Corrective Action to be Taken

1. Plant Procedure 10.24.12 will be added to those procedures which are included in the initial and continuing training programs for Plant I&C Technicians.
2. With regard to ensuring improved control of maintenance and surveillance activities, the Supply System committed to a complete review of the work control process in response to NRC Inspection Report 89-06 (Reference 1). This included any necessary training that may be required. The 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 and control of changes to the package. Additional staffing has been provided to coordinate this effort. A major part of the review will be directed toward improving the human factors elements of the process. The end product of this activity will be improved work packages for the craftsmen. The review is scheduled to be completed by December 1, 1989; with formal changes to the program to be completed by February 1, 1990 (Reference 2).

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. Training for supervisors and managers is ongoing and scheduled for completion during the first quarter of 1990. The schedule for other employees is currently being developed and the training will follow accordingly.

Date of Full Compliance

Plant Procedure 10.24.12 will be added to the Plant I&C Training Program by December 8, 1989. Initial training on the procedure will be completed by December 30, 1989.

## Appendix B

As requested in the cover letter to the subject inspection report, the following is an assessment of those issues relating to the Supply System SSFI of the Low Pressure Core Spray (LPCS) System.

1. The applicability of findings to other plant safety systems and the assessment/resolution of that applicability:

As you are aware, the Supply System is currently performing a self-initiated SSFI on the AC Electrical Distribution System. This is currently scheduled to be concluded in December, 1989. We believe that the SSFI methodology has significant benefit for the Supply System in assessing whether the system is being operated and maintained in a manner that preserves full capability to perform its safety related mission. It also identifies issues that may be applicable to other safety systems. Our intent is to continue to perform SSFIs.

With regard to the observations which resulted from the LPCS SSFI, the observations which may be applicable to other systems have been categorized. The observations within each category will be compared to actions the Supply System already has underway in response to previously identified issues (Engineering Improvement Plan, Configuration Management Improvement Program, etc). Appropriate actions will be recommended for consideration and resolution of programmatic issues.

2. The establishment and implementation of a Supply System Configuration Control Program:

The Supply System currently has in place an effective configuration control program. However, it was recognized that improvements to this program were necessary as a result of the SSFI performed by the NRC on three WNP-2 systems in 1987. Subsequent reviews, including our self-initiated SSFI, supported this concern.

As you are aware, a Nuclear Operating Standard (NOS-32) was issued in June, 1989 which established basic policies and responsibilities for the Configuration Management Program. A Configuration Management Improvement Program (CMIP) was also recently approved which established actions, responsibilities, and schedules for necessary improvements. A number of Supply System organizations are currently supporting this effort. The CMIP program will be based upon the documents and hardware identified through the Design Requirements Documents process.

Other activities are currently underway which relate to the Configuration Management Program. These include:

- o Resolution of programmatic issues identified in the LPCS SSFI as previously discussed. Particular attention will be directed to the timeliness of programmatic actions which relate to Level I observations.
- o Resolution of programmatic issues identified through the Plant Problem Evaluation process.
- o Development of five Design Requirements Documents during this fiscal year for three safety systems and two topical areas. Current plans are to prepare ten documents next year.
- o Performance of SSFIs on safety significant systems.
- o Performance of actions identified in the Engineering Improvement Program.
- o Continuation of technical assessments in engineering design and operational activities by Nuclear Safety Assurance which relate to configuration management.

For the above reasons, we believe that necessary actions are currently underway which provide the resolution of identified configuration control issues and to detect configuration management issues which may exist in other systems.

3. Improvement of plant tracking/management information systems to make these less redundant and more user friendly, with flexible sorting systems:

Plant tracking/management information system improvements have been implemented for approximately a year which addressed the user friendliness and sorting capability of the Plant Tracking Log (PTL). A number of action commitments are now being tracked by the PTL instead of other commitment logs in order to obtain increased management attention and to eliminate possible redundancy. We now currently use the PTL as the single tracking mechanism for corrective action tracking for NOVs, LERs, Inspection Report open items, QA surveillances, audits, etc. We have reviewed PTL entries for accuracy and assessment of responsibilities, provided sort capability for late actions as well as 30, 60 and 90 day look ahead reports to trigger prompt action. We have commitment-type sponsors who set goals and track progress of commitments. The PTL is now a useful management tool. A recent QA audit of this are confirmed the effectiveness of PTL and monitoring efforts to achieve consistent results of PTL closure efforts.



The Supply System has previously recognized the need, however, for improvements to our information management system. A program is currently being developed to improve the quality of Supply System information management systems and, over time, make the information available to individuals in the organization. In addition, the Supply System has recently established a position (Director, Information Services) to provide overall policy and direction for this program in addition to other responsibilities.

The Supply System also recognizes the need, however, to deal with the backlog of actions requiring resolution. Actions have been initiated to secure a contractor to assist in resolution of these backlog issues. Current plans are to select a contractor, establish prioritized issues for resolution, and initiate contractor actions on these issues within the near future.

We believe that the above actions will provide improvements to our information management system and reduce the backlog of important issues which need resolution.

4. Policy regarding use of the Vital Maintenance Work Request process:

Our policy on use of vital MWRs was revised after the 1988 SALP recommendations. The elements of that policy include limited use of vitals to force creation of a normal MWR if the vital activity is to take more than 24 hours to complete, and management review of the appropriate use of the vital process at our Management Review Committee (MRC) morning meetings. To date, we believe the vital process is under control and working as intended; however, we will continue to monitor this process and make changes where necessary.

5. Policy regarding field modification of maintenance procedures:

The cases cited in the SSOMI NOVs (NRC Inspection Report 89-06) on unauthorized or inappropriately authorized deviations to MWR work instructions were clearly a violation of our existing program. We addressed these issues in our response to the specific NOV's. Further work control initiatives were discussed in the recently-submitted SALP update report (Reference 3) which provide for better control and review of such changes and the circumstances which required deviations.

