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 AUTH. NAME AUTHOR AFFILIATION
 BOUCHEY, G.D. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 FAULKENBERRY, B. Region 5, Ofc of the Director

SUBJECT: Forwards original CYGNA 890814 rept in response to NRC
 request for addl info re spare parts commercial dedication.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

November 30, 1989
Docket No. 50-397
G02-89-217

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

Dear Mr. Faulkenberry:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 89-21
SAMPLE PLAN INFORMATION.

Reference: Letter, G02-89-138, G. D. Bouchey to B. H. Faulkenberry, dated August 15, 1989.

This letter responds to NRC's requests for additional information regarding the Supply System's spare parts commercial dedication program. The following was requested at the November 20, 1989, management meeting: 1) a copy of the report by our contractor, CYGNA, as a result of independent review of 50 completed commercial dedication actions under the former Supply System procedures, and 2) the basis for the sampling process used to reach positive conclusions regarding our commercial grade spare parts/components. You will find attached (Attachment 1) a copy of the original CYGNA report, dated August 14, 1989. You will also find attached (Attachment 2) a description of the sample method and our conclusion based on reviews of this sample of our commercial grade population.

We would like to reiterate some of the conclusions regarding our commercial grade dedication program resulting from the November 20, 1989, Management Meeting:

- We understand that the NRC has no safety significant concerns associated with the 10 commercial grade items reviewed by the NRC in Inspection Report 89-21.
- We understand that the NRC has found our recently revised (May 1989) commercial grade program to be acceptable with respect to forthcoming guidelines for this type activity. (We recognize the NRC has not inspected its implementation.)

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Mr. B. H. Faulkenberry

Page 2

November 30, 1989

NUCLEAR PLANT NO. 2

LICENSE NO. NPF-21

NRC INSPECTION REPORT 89-21


SAMPLE PLAN INFORMATION

- We understand the NRC is primarily concerned with potential for safety significant problems associated with the past procurement of commercial grade items. We believe the data supplied herein will resolve this concern.
- The Supply System's position regarding the potential enforcement action regarding past commercial grade dedication is that escalated enforcement is not warranted. The level of documentation available for our past commercial grade procurements does not meet the new NCIG-07 standard but these documentation deficiencies do not represent a safety significant problem with the hardware. However, our dedication process for past procurements is consistent with 10CFR50 Appendix B and industry practice for the time frame under consideration, prior to March of 1989.
- The Supply System has committed to full compliance with the EPRI NCIG-07 guidance by 1/1/90.

The Supply System is committed to excellence in the area of commercial grade procurement. As you are aware, our recent establishment of a procurement engineering organization was the result of a recommendation from an internal task force which was given the task of looking at our engineering organization and processes to identify potential improvements. Further improvements in our program have been made as a result of NRC questions or findings.

Thank you for the opportunity to present our findings at the November 20, 1989 Management Meeting and for your patience during the presentation. We appreciate your willingness to consider this additional information in your enforcement action deliberations.

Very truly yours,


G. D. Bouche, Director
Licensing & Assurance

SHP/tlr

Attachments

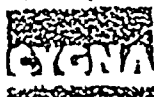
cc: Mr. C. J. Bosted, Resident NRC Inspector (901A)
Mr. J. B. Martin, Region V NRC
Mr. N. S. Reynolds, Bishop, Cook, Purcell & Reynolds
Mr. R. B. Samworth, NRC
Mr. D. L. Williams, BPA (399)
Mr. R. C. Wilson, NRC

ATTACHMENT 1

CYGNA REPORT

"Commercial Grade Dedication Project for
Washington Public Power Supply System
Contract No. C-30298"

- Note 1: This report documents the finding of CYGNA in review of 50 commercial grade items dedicated by the Supply System. The standard of acceptance was EPRI-NP-5652 (NCIG-07).
- Note 2: The one item defined by CYGNA as "inadequately dedicated" has since been shown to be acceptable. (See attached letter dated November 28, 1989, from CYGNA.)
- Note 3: CYGNA found: "The Supply System technical approach for dedicating safety related items was found to be generally sound. However, the documentation requirements of current guidelines were not met in many cases."
- Note 4: The Supply System expects to have resolved all concerns with these items by March, 1990.



ENERGY
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2121 N. California Blvd., Suite 320, Walnut Creek CA 94596

415/931-5733

90038.002

November 28, 1989

Mr. Steve Peck
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Mail Drop 98SU
Richland, Washington 99352

*Subject: WPPSS Commercial Grade Parts Procurement
Qualification/Dedication Status of Evaluation Package 0774*

- References: 1) Cygna Report No. 89162-TR001, Rev. 0; dated 8/14/89; Commercial Grade Dedication Project for Washington Public Power Supply System
- 2) EPRI NP-5652; Guideline for the Utilization of Commercial Grade Items in Nuclear Safety Related Applications (NCIG-07)

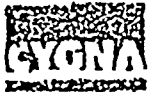
Dear Mr. Peck:

During the initial Cygna review of fifty (50) selected procurement packages, one package (Evaluation Package 0774 - Male Connector Pins) was deemed to be inadequately dedicated as documented in the Cygna report (reference 1).

During the weeks of November 6-17, 1989, Cygna reviewed the conclusions of this report, in the context of developing presentation material to support the Supply System in meetings to be held with NRC Region V on November 20, 1989. During this later time frame, Cygna was informed that the Supply System intended to dedicate the piece parts controlled by Evaluation Package 0774 by determining critical characteristics and verifying those critical characteristics by post-receipt inspection. Subsequently, Cygna was informed that the Supply System had performed a 100% inspection of these relatively simple male connector pins to the Supply System determined critical characteristics (determined to be presence of gold plating and critical dimensions).

It is Cygna's conclusion that this post-receipt inspection performed by the Supply System is in accordance with the guidance of NCIG-07 (Reference 2), using Method 1, Special Tests and Inspections. Therefore, in accordance with the guidance of NCIG-07 (reference 2), documentation of the results of the 100% receipt inspection (i.e., acceptability of the pins meeting the Supply System determined critical characteristics) provides "objective evidence" supporting use of these pins in safety related applications.

The conclusion of Cygna's report (Reference 1) has been superseded by the Supply Systems' subsequent post-receipt dedication of the male connector pins covered by Evaluation Package 0774, and Cygna now concurs that the connector pins have been appropriately dedicated for safety related use.



Mr. Steve Peck
November 28, 1989

Page 2

Should you require further information, or have any questions on this information, please feel free to contact either Mr. Rick Lodwick or me at your convenience.

Very truly yours,

William Craig
Project Manager

Enclosures