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SUBJECT: Responds to NRC 891129 ltr re violations noted in Insp Rept 50-397/89-24.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

December 22, 1989
G02-89-227

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, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 89-24
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated November 29, 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, the 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

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PDR ADOCK 05000397
PDC
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APPENDIX A

During an NRC inspection conducted October 2 - 5, 1989, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1989), the violation is listed below:

- A. 10CFR 50.54(q) requires that licensees follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E to Part 50. Paragraph IV.F.5 of Appendix E to Part 50 requires that any weak or deficient areas identified during drills or exercises be corrected.

Contrary to the above requirement, as of October 4, 1989, the licensee had not corrected a weak area, involving the adequacy of notifications to plant personnel, identified during the annual emergency exercise conducted on September 13, 1988.

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

Validity of Violation

The Supply System acknowledges the validity of this violation in that a weak area involving announcements to plant personnel during emergency drills and exercises had not been satisfactorily resolved. The reason for the violation was an ineffective corrective action process for resolving such weaknesses.

Corrective Steps Taken/Results Achieved

1. During the most recent emergency drill (December 6, 1989), changes were implemented to address the issue of announcements to personnel. Changes included writing the message to be announced and providing prompting aids to serve as reminders for personnel to repeat the message. An internal assessment has determined that these changes have improved the process of making announcements to personnel.
2. In accordance with plant procedures, a root causes analysis was performed for this violation and it was determined that the root cause was "procedures less-than-adequate." The process established to resolve the deficiencies did not result in the depth of investigation necessary to correct certain issues. As a result, this process was not effective as anticipated.

During the time frame that these weaknesses were noted, a system had been developed whereby deficiencies/weaknesses were identified, tracked and corrected by means of Corrective Action Records (CARs). However, this process had not yet been incorporated into a Support Services Instruction.

As a result of a Quality Assurance Audit (89-467), Support Services Instruction SSI 9.1, "Emergency Preparedness Corrective Action Record (CAR) Processing", was developed to control the CAR process and resolve the problems noted. This instruction was recently implemented (August 1989) and is considered an improved system because it prescribes the use of Problem Evaluation Requests (PERs) and the performance of Root Cause Analyses.

However, as a part of the root cause analysis for this violation, it has been determined that further improvements can be made to Support Services Instruction 9.1. The procedure at this time does not contain specific criteria for determining when either a PER or a Root Cause Analysis should be prepared to resolve a CAR issue.

A PER is a document used to provide a controlled method to formally communicate the existence of a problem to plant management for action. It is a single sheet form which can be initiated by anyone knowledgeable of an existing or potential problem which requires resolution.

3. Changes have been implemented regarding the manner in which NRC Emergency Preparedness items are tracked to completion. The Plant Technical Compliance Group is responsible for tracking NRC items; however, prior to the changes discussed below, the group did not perform this function for emergency preparedness-related items.

Beginning in January 1989, the process for tracking and resolving NRC identified items was improved. With the exception of those reports which involve specific security issues, the Plant Technical Compliance Department now prepares a PER for all NRC Inspection Reports that contain items which require resolution (i.e., NOV's, open items, follow-up items, unresolved items, etc.). All PER's are reviewed by the Management Review Committee (MRC). The purpose of the MRC is to provide initial assessment, assignment of priority and allocation of resources for each PER.

Resolution of these NRC-identified items is tracked on the Plant Tracking Log (PTL). Another improvement in this process is that all NRC Notices of Violation require a formal Root Cause Analysis.

In addition, this new process was implemented for this particular violation.

Corrective Action to be Taken

1. Criteria will be developed, and incorporated into Instruction SSI 9.1, for determining when to generate a PER for resolving a CAR issue.
2. Criteria will be developed, and incorporated into Instruction SSI 9.1, for determining when to perform a Root Cause Analysis for a CAR issue.
3. As a result of further review of this violation, it has been determined that a formal root cause analysis should also be performed on the failure to notify plant personnel which was identified as a weakness during the 1989 Emergency Exercise.

Date of Full Compliance

All further corrective action will be completed by March 1, 1990.