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SUBJECT: Responds to NRC 891219 ltr re deviation noted in Insp Rept
 50-397/89-31.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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January 12, 1990
G02-90-008

Docket No. 50-397

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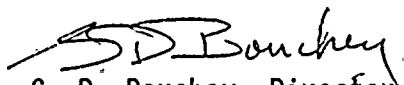
Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 89-31
RESPONSE TO NOTICE OF DEVIATION

The Washington Public Power Supply System hereby replies to the Notice of Deviation contained in your letter dated December 19, 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 deviation 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 inspection report, other corrective actions taken as a result of the emergency lighting review are also described in Appendix A.

Very truly yours,


G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

cc: JB Martin - NRC RV
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
NS Reynolds - BCP&R

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Q PDC

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APPENDIX A

During any NRC inspection conducted on October 2 - November 12, 1989 a deviation from a commitment to the NRC was identified. In accordance with the "General Statement of policy and procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1988), the deviation is listed below:

The WNP-2 Final Safety Analysis Report, Amendment No. 36, dated December, 1985, Table 9.5-8, Locations of Emergency Lighting, shows normal AC lighting being provided to Residual Heat Removal (RHR) Valve Room #1, located on elevation 471' of the reactor building.

Contrary to the above, all lights in this room were burned out on October 31, 1989; thus no normal AC lighting was provided to it.

This is a Deviation.

Validity of Deviation

The Supply System acknowledges the validity of this deviation. The reason for the deviation was that a formal process had not been established for identifying and replacing the defective lighting units described in the inspection report. Furthermore, the Area/Floor Coordinator tour process was not as effective as anticipated for identifying and correcting defective lighting units.

Corrective Steps Taken/Results Achieved

1. The burned out lights in the Residual Heat Removal (RHR) valve room were replaced.
2. A walkdown of all Plant lighting was performed and any discrepancies noted were addressed by means of the Maintenance Work Request (MWR) process for resolution.
3. Blue stickers were placed on all accessible "Normal Emergency" and "Emergency Reserve Ballast" lighting units to distinguish them from the normal lighting (fluorescent units) in the Plant. These lights require immediate action if they are found to be defective.
4. A letter was issued to all Plant personnel which explained this differentiation and requested that, if defective units are noted, personnel should contact either the appropriate Area/Floor Coordinator or the Electrical Maintenance shop for action.

Corrective Action to be Taken

1. Plant Procedure (PPM) 10.25.64, "Emergency Ballast Lights", is currently in the process of being expanded to provide a formal process for the inspection of lighting units. The purpose of the procedure, which is being re-titled, "Normal and Emergency Lighting", is to ensure uniform inspections are performed and records are maintained for Normal AC Lighting, Normal-Emergency AC Lighting, DC Lights and Battery-Powered (Ballast type) Emergency Lighting.

In addition, the monitoring of Plant lighting will be the responsibility of the Area/Floor Coordinators, Health Physics personnel (in radiation areas they normally tour) and all personnel in the performance of their daily tasks. The procedure will also explain that the lights with blue stickers require immediate action if found to be defective.

2. PPM 10.25.63, "Emergency Lighting Inspection," is also currently in the process of being expanded. The purpose of this procedure is to provide instructions and check sheets necessary to ensure uniform inspections and records for battery-powered emergency lighting.

Changes to the procedure include 1) defining each battery unit type and the inspections that are required, and 2) emphasizing the requirement to verify that water levels are between the upper and lower marks for non-maintenance free batteries.

3. In addition to the changes to PPMs 10.25.63 and 10.25.64, the Electrical Maintenance Shop Practices Manual is currently being revised to provide guidance for Electrical Shop personnel to check Plant lighting as part of shift assignments.

Date of Full Compliance

The revisions to PPMs 10.25.63, 10.25.64 and the Electrical Maintenance Shop Practices Manual will be issued by February 28, 1990.

