

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9002220608 DOC. DATE: 90/02/05 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: MARTIN, J.B. RECIPIENT AFFILIATION: Region 5, Ofc of the Director

SUBJECT: Responds to 891103 request for addl info re fire protection Tech Spec compliance.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 3
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	PD5 PD	1 1	SAMWORTH, R	1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	AEOD/TPAD	1 1
	DEDRO	1 1	NRR SHANKMAN, S	1 1
	NRR/DLPQ/LPEB10	1 1	NRR/DOEA DIR 11	1 1
	NRR/DREP/PEPB9D	1 1	NRR/DREP/PRPB11	2 1
	NRR/DRIS/DIR	1 1	NRR/DST/DIR 8E2	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE LIEBERMAN, J	1 1	OGC/HDS2	1 1
	REG FILE 02	1 1	RES MORISSEAU, D	1 1
	RGN5 FILE 01	1 1		
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 26 ENCL 0

MA/4

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 5, 1990
G02-90-018

Docket No. 50-397

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: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
RESPONSE TO REQUEST FOR INFORMATION

- Reference: 1) Letter, RP Zimmerman (NRC) to AL Oxsen (SS)
(Fire Protection Inspection), dated 11/3/89
- 2) Letter, G02-89-207, GC Sorensen (SS) to NRC
same subject, dated 11/14/89
- 3) Letter, G02-89-209, GC Sorensen (SS) to NRC,
"Amendment No. 41 to the WNP-2 FSAR", dated 11/17/89

In Reference 1 the NRC identified four action items that the Supply System had agreed to accomplish by the dates included therein. The purpose of this letter is to confirm that those commitments have been completed. The identified items and the Supply System's actions are as listed below.

1. *You will inform Region V whether or not all remedial actions, that would have been required by the LCOs in the deleted Technical Specification, are currently in place by November 10, 1989.*

On November 9, 1989, members of the Supply System staff met with C. Bosted (NRC Resident Inspector) to inform the Region of the efforts that had been taken to confirm that all remedial actions as described above were currently in place. This was followed up with a letter to Region V on November 14, 1989 (G02-89-207).

The result of this effort was to satisfy ourselves that we had continued to routinely recognize the previous technical specification requirements.

9002220608 900205
PDR ADOCK 05000397
F PNU

1/6
IE-01

Page Two
RESPONSE TO REQUEST FOR INFORMATION

In addition to the plants efforts confirming Fire Protection Technical Specification compliance an independent Quality Assurance Surveillance was performed to evaluate various Fire Protection attributes. The QA Surveillance consisted of verification that WNP-2 is currently in compliance with the pre-May 25, 1989 Technical Specifications and verification that WNP-2 has continued to be in compliance with pre-May 25, 1989 Technical Specifications during May 25, 1989 through November 2, 1989.

Activities verified associated with current compliance included: checking the LCO log for inoperable Fire Protection (FP) equipment and comparing any applicable items to the Technical Specifications; checking the current FP checklist index in the Radwaste Control Room for impaired equipment and comparing the representative checklist to the Technical Specifications; and interviewing several Shift Support Supervisors/Operations personnel.

Activities verified associated with compliance between May 25, 1989 and November 2, 1989 included: sampling RO/SRO log entries since May 25, 1989 in order to identify FP failed surveillances and applicable Technical Specification compensatory measures taken, if required; review all Maintenance Work Requests (MWRs) since May 25, 1989 applicable to FP EPNs and applicable Technical Specification compensatory measures taken, if required; and review of historical FP impairment checklists open between May 25, 1989 and November 2, 1989 for applicable Technical Specification compensatory measures taken, if required.

The results of the surveillance confirmed that the Supply System is in current compliance and has continued to comply with the Tech Spec requirements. One minor discrepancy was identified associated with documenting a compensatory measure. Interviews with responsible personnel disclosed that the required Technical Specification compensatory measure was taken as required; however, no documented evidence exists to substantiate the action. This is considered a minor anomaly, and is being addressed through the WNP-2 QA Program (refer to Quality Finding Report 2-89-106-01)

2. *You have made an interim change to Plant Procedure 1.3.10 to specifically incorporate all the fire protection surveillances, remedial actions, and LCOs which were removed from your Technical Specifications by Amendment 67 to your operating license. All future changes to this procedure will be conducted in accordance with 10 CFR 50.59.*

PPM 1.3.10 was deviated (and approved by POC) on November 2, 1989. The deviation incorporated the actual pages that were removed from the Technical Specifications in Amendment 67. All future changes to those portions of the procedure that contain information previously contained in the Technical Specifications will be subjected to review in accordance with the established 50.59 process.

3. *You will have permanent plant procedures in place implementing the fire protection surveillances, remedial actions, and operational conditions, as discussed in 2., above, by November 29, 1989.*

In accordance with the provisions of 10 CFR 50.59, and subsequent to the procedure deviation discussed in 2 above, on November 22, 1989 a further revision to PPM 1.3.10 was approved by POC which incorporates the pertinent LCOs and remedial actions previously contained in the Technical Specifications. Reference is also made therein to performance of the fire protection surveillances in accordance with approved procedures. Those procedures are currently contained in the Volume 2, 7 and 10 procedures and are controlled by the Scheduled Maintenance System (SMS) process. An orderly approach was followed to relocate them to Volume 15, to be consistent with plant policy. This was completed January 17, 1990.

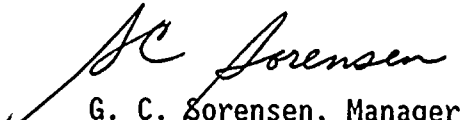
Any future changes to those portions of this procedure will be conducted in accordance with the provisions of PPM 1.3.43 entitled "10CFR 50.59 Evaluation Process".

4. *You will submit, by November 22, 1989, an amendment to your FSAR which discusses the fire protection surveillances, remedial actions, and LCOs discussed in 2.*

On November 17, 1989 (G02-89-209) Amendment No. 41 to the WNP-2 FSAR was submitted as agreed to.

Even though the Supply System continued to comply with the Technical Specification requirements after their removal, it would have been a smoother transition had the procedures been available for implementation at that time.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

HLA/bk

cc: NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
Document Control Desk