

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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SUBJECT: Responds to NRC 900201 ltr re violations noted in Insp Rept  
50-397/89-30.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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March 2, 1990  
G02-90-034

Docket No. 50-397

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 89-30  
RESPONSE TO LEVEL IV NOTICE OF VIOLATION

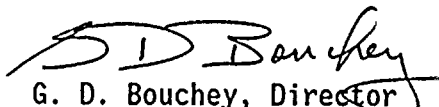
Reference: Letter, JB Martin (NRC) to DW Mazur (SS),  
dated February 1, 1990

The Washington Public Power Supply System hereby replies to the Level IV Notice of Violation contained in your letter dated February 1, 1990. 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. As requested in the referenced letter, Appendix A also provides measures we will implement to provide assurance that similar problems do not remain undetected or uncorrected.

The referenced letter also included a Level II Notice of Violation, for which a response was not required. We are currently evaluating our position with regard to this issue. Accordingly, a 30-day extension for this item was requested and granted by the Office of Enforcement.

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

TEO  
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## APPENDIX A

During NRC inspections conducted during the periods of March 3 - 24, 1986, January 12 - 15, 1987, June 6 - 10, 1988 and October 23 - 27, 1989, violations of NRC requirements were identified. These violations involved the implementation of the fire protection program. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1989), the violations are set forth below:

- III. WNP-2 Technical Specification 6.8.1.g requires that written procedures be established, implemented and maintained covering Fire Protection Program implementation.

Contrary to the above, on October 25, 1989, Revision No. 12 of Abnormal Procedure No. PPM 4.12.1.1, which implements the WNP-2 Control Room Remote Shutdown capability, a required element of the Fire Protection Program, was not appropriate to the circumstances in that:

- A. Step No. A.10 incorrectly required that RHR system valve No. V-123B, instead of valve No. V-123A, be closed.
- B. Step No. A.27 incorrectly required that cooling fan No. RRA-FN-1 be made operable prior to RHR pump room No. 2B exceeding specified temperature limits, rather than requiring fan No. RRA-FN-3, (which provides cooling to RHR Pump Room No. 2B) to be operable.
- C. Rather than specifying the appropriate cooling equipment, Step No. A.27 incorrectly required that Equipment No. WMA-TI-9, which is only a temperature indicator, be made operable prior to the Remote Shutdown Panel Room exceeding specified temperature limits.

This is a Severity Level IV Violation (Supplement I).

### Validity of Violation

The Supply System acknowledges the validity of this violation. A formal root cause analysis was performed for this violation and, although the reason for the procedural deficiencies could not be specifically determined, contributing factors were identified and are discussed as follows:

- RHR-V-123B - Contributing causes are 1) Equipment/Design Deficiency/Ergonomics Poor (placement of an "A" RHR valve in the RHR "B" mimic), and 2) Equipment/Design Deficiency/Labeling Less Than Adequate (LTA) (RHR-V-123A power transfer switch labeled as RHR-V-123).
- RRA-FN-1 - Contributing cause is Equipment/Design Deficiency/Drawings LTA (inadequate information on the flow diagram for Reactor Building HVAC).
- WMA-TI-9 - Contributing cause is Personnel/Lack of Attention/Concentration (oversight in failure to recognize table headings).

Corrective Steps Taken/Results Achieved

1. Plant Procedures (PPMs) 4.12.1.1, "Control Room Fire/Evacuation", and 4.12.1.2, "RPV Remote Cooldown", were revised to correct the deficiencies noted.
2. A procedural training course, developed by a consultant specifically for WNP-2, was planned prior to the receipt of this violation. The training course, which was completed on January 19, 1990, provided 1) an outline of the fundamental elements of procedures, 2) appropriate human factors elements specific to procedures, and 3) verification and validation techniques. The course also included exercises to practice and demonstrate the methods presented, with specific focus on the review of existing WNP-2 procedures.

Several members of the Plant staff (including Quality Assurance) involved in the procedure review and development process participated in this training.

3. As a part of the root cause efforts, an evaluation of the consequences of these procedural deficiencies was performed. The results of the evaluation are presented as follows:

a. RHR-V-123B

The current revision of PPM 2.4.2, "Residual Heat Removal System", administratively mitigated this deficiency. In the PPM Valve Checklist attachment, both RHR-V-123A and RHR-V-123B are specified "CLOSED". The System Power Supply Checklist attachment directs that electrical breakers for both valves be cautioned tagged open during modes 1, 2 and 3. Therefore, if a control room fire occurs during a plant condition when an overpressure in the RHR system could occur, the boundary is administratively maintained through lineups specified in PPM 2.4.2. This administrative control was added to PPM 2.4.2 in May 1986.

b. RRA-FN-1

This deficiency was mitigated because when the RHR 2B pump is energized, RRA-FN-3 is automatically started. Additionally the procedure requires hourly temperature monitoring of the pump room. If the temperature exceeds 150°F, operators are instructed to make the cooling equipment operable. The highest safe operating temperature for the pump is listed as 200°F. The following sequence of events would have to occur for the pump room to exceed the safe operating temperature:

- The fan would fail to automatically energize.
- The temperature would increase to above 150°F.
- The operator would energize the incorrect fan RRA-FN-1.

- Assuming the incorrect fan was energized the temperature would continue to increase.
- During the next hourly reading the operator does not notice an increase in room temperature with the pump room fan not in service, after having energized a fan previously.
- Hourly readings continue with no actions by operators in light of situational conflicts (see above) until room temperature exceeds 200°F.

c) WMA-TI-9

Guidance contained in the body of the procedure provided the correct actions to be taken if Remote Shutdown Room Temperature increased. Since no incorrect information was included, and the guidance contained the corrective action for the condition, the impact of this editorial deficiency was negligible.

Corrective Action to be Taken

1. Plant personnel are currently in the process of making improvements to the Plant Operations Procedure Writer's Guide.
2. Plant Operations personnel are in the process of developing an improved Procedural Verification Program. The current plan is to include checklists in this process, which would significantly increase the opportunity to detect the type errors identified in this violation.

Verification is concerned with written correctness and technical accuracy. Written correctness ensures information is incorporated as specified by administrative guidance. Technical accuracy ensures proper incorporation of generic and plant specific technical information.

Date of Full Compliance

1. The revised Plant Operations Procedure Writer's Guide will be issued by July 1, 1990.
2. The Procedural Verification Program will be initiated by July 1, 1990

