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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

March 23, 1990
G02-90-060

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 89-40
RESPONSE TO NOTICE OF VIOLATION

References: 1) Letter, G02-90-008, GD Bouchey (SS) to NRC, "NRC Inspection Report 89-31, Response to Notice of Deviation", dated January 12, 1990
2) Letter, G02-90-023, GD Bouchey (SS) to NRC, "NRC Inspection Report 89-38 Response to NOV", dated February 12, 1990

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated February 21, 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.

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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APPENDIX A

During an NRC inspection conducted on December 18, 1989 - January 28, 1990 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specifications, Section 6.8.1, states in part: "Written procedures shall be established, implemented, and maintained covering...a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978... g. Fire Protection Program Implementation."

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, Section 9.a, states in part: "Maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions... appropriate to the circumstances."

PPM 10.25.63, "Emergency Lighting Inspection," Revision 4, Step 7.A.4, states in part: "Verify the water levels are between the upper and lower marks for the non-maintenance free batteries. Fill with DI water, if required...".

PPM 10.25.63, Revision 4, Step 7.C.7 states, "Have operations close circuit breakers opened in Step 5."

Scheduled Maintenance System (SMS) Task 01 for residual heat removal (RHR) system valves RHR-V-24A and RHR-V-24B states in part: "Check for loose... yoke operator bolts...".

Contrary to the above:

1. Electrolyte levels were not checked in September and October 1989 when preventive maintenance was performed on lighting batteries C120/441/3X, C121/441/1X, C121/441/2X, and W467/4X.

2. The circuit breakers (disconnects) for emergency 25 VDC lighting in the stairwell from the control room to the remote shutdown room were not closed after preventive maintenance was performed on January 7, 1990.

3. Proper torque on operator-yoke bolts for valve RHR-V-24A was not verified when preventive maintenance was performed on October 1, 1989. The preventive maintenance task documentation did not contain instructions to check the torque on yoke operator bolts, and the bolts were verified only finger-tight.

These items represent a Severity Level IV violation (Supplement I).

Validity of Violation

The Supply System acknowledges the validity of this violation. The reasons for the violation are discussed as follows:

1. Electrolyte Issue - Procedures Less Than Adequate (LTA) and Procedures Not Followed. Plant Procedure (PPM) 10.25.63, "Emergency Lighting Inspection", contained the requirement to check for low battery electrolyte levels on a monthly basis. A copy of the procedure was normally attached to a Scheduled Maintenance System (SMS) card that directed performance of Attachment B of the procedure on a monthly basis. A normal practice was to remove the procedure from the SMS card, and take only the card and Attachment B into the field to perform the tasks directed. However, Attachment B to the procedure did not direct personnel to check for low battery electrolyte levels.

2. Circuit Breaker Issue - Communications LTA. Although PPM 10.25.63 contained a step to have Operations close the circuit breakers upon completion of the surveillance, communications were incomplete for ensuring closure of the circuit breakers. It could not be positively determined where the communication breakdown occurred.

3. Torque Issue - Management Programs LTA. The decision was made to check fastener tightness on vibration - sensitive valves. However, the method of inspection was inadequate and no acceptance criteria were established to ensure that the fasteners would not back out during normal operation.

Corrective Steps Taken/Results Achieved

1. As stated in our response to Notice of Deviation (NOD) 89-31-01 (Reference 1), Plant Procedure (PPM) 10.25.63, "Emergency Lighting Inspection", was 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 included 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.

   In our response to NOD 89-31-01, it was stated that the revision to PPM 10.25.63 would be issued by February 28, 1990. However, due to further enhancements, the procedure was issued on March 23, 1990. These enhancements included adding sign-off steps for 1) checking battery electrolyte levels, and 2) ensuring that the circuit breakers for emergency lighting are closed upon completion of preventive maintenance.

2. As stated in our response to Notices of Violation (NOV) 89-38-02 and 89-38-03 (Reference 2), an evaluation of the overall torquing program is currently being performed to determine the best methodology for providing guidance on torquing, including torque derivation, and ensuring that this methodology is specified in the work package. Several other program enhancements were also discussed in the response and included 1) developing an inspection to check actual torque values for valves (which are subject to loose fasteners due to vibration) at a specific frequency depending on valve operating conditions, 2) issuing a design change for valves RHR-V-24A and RHR-V-24B which provided a specified torque for the fasteners and required positive captivating devices, and 3) preparing design changes to provide specified torque values and positive captivating devices for the 23 additional valves which were identified as being subject to loose fasteners due to vibration.

Corrective Action to be Taken

As stated in our response to NOV 89-38-03, efforts are currently in process to review Scheduled Maintenance System (SMS) task cards to verify adequacy, and improve the task description or provide additional instructions where necessary.

The efforts will consist of a complete overhaul of the Preventive Maintenance Program over the next 30 months, and includes the adding of specific work instructions for unique tasks. An outside contractor to provide this service is currently in the process of being selected. The contractor will perform a review of the existing program, utilizing reliability-centered maintenance techniques, and changes will be made accordingly.

Date of Full Compliance

1. The overall evaluation of the torquing program to address these concerns will be completed by April 15, 1990. Changes to the process will be implemented accordingly.

2. The design change for valves RHR-V-24A and RHR-V-24B (which was issued February 5, 1990) will be implemented prior to the upcoming maintenance and refueling outage, currently scheduled to begin April 20, 1990.

3. In our response to NOV 89-38-03, it was stated that Generation Engineering would issue the design change packages for the remaining 23 valves by March 30, 1990. However, completion of this effort has taken longer than anticipated when the original response was submitted. Accordingly, the schedule has since been revised such that the packages will now be issued to support design change implementation which will still commence during the upcoming maintenance and refueling outage.