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 SORENSEN,G.C. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
 FAULKENBERRY,B. Region 5, Ofc of the Director

SUBJECT: Forwards status rept for commitments made in 891130 ltr re commercial grade dedication process.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

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April 16, 1990
Docket No. 50-397
G02-90-76

Mr. B. H. Faulkenberry
Deputy Regional Administrator
U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Faulkenberry:

Subject: COMMERCIAL GRADE DEDICATION STATUS REPORT

Reference: Letter, G02-89-217, G.D. Bouchey to B.H. Faulkenberry, NRC
Inspection Report 89-21 Sample Plan Information, dated November
30, 1989.

The referenced letter provided additional information regarding the Supply System's commercial grade dedication process as a follow-up to a November 20, 1989, management meeting.

In Attachment I to the referenced letter, we summarized the finding of our consultant "CYGNA Energy Services" and provided a report by CYGNA discussing their review of 50 commercial grade items dedicated by the Supply System. While CYGNA found the Supply System approach to dedication to be generally sound, they did recommend that the Supply System perform additional work to bring documentation up to current guidelines. In our November 30 letter, we provided our estimated schedule for completion of this activity as well as other steps being taken by the Supply System to assure the adequacy of our commercial grade dedication process.

The attachment to this letter provides a status report for those commitments made in the November 30 letter.

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Mr. B. H. Faulkenberry

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COMMERCIAL GRADE DEDICATION STATUS REPORT

We have completed the resolution of the ten samples identified by the NRC and the fifty (50) samples identified by CYGNA. We are nearing completion of an additional sample of commercial grade items in storage.

Based on the results of the samples examined by the NRC, the samples reviewed by CYGNA, and additional samples reviewed by the Supply System we have demonstrated reasonable assurance that the inventory of commercial grade items is acceptable for use in safety-related applications.

Should you have any questions, please contact me at (509) 372-5238 or Mr. S. H. Peck at (509) 377-2022.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs (MD 280)

GCS/tmd

Attachment

cc: Mr. N. S. Reynolds, Bishop, Cook, Purcell & Reynolds
Mr. R. B. Samworth, NRC
NRC Document Control Desk
Mr. D. L. Williams, BPA (399)

EVALUATION OF COMMERCIAL GRADE PROCUREMENT PROGRAMS

<u>Actions</u>	<u>Original Estimated Completion</u>	<u>Status As Of 3/31/90</u>
<u>Future Procurements</u>		
1) Upgrade current process to enhance conformance to NCIG-07 guidelines	1/90	See Note 1
2) Independent QA/safety assessment of conformance with NCIG-07	12/89	Complete (Audit 89-503)
<u>Past Procurements</u>		
1) Resolution of 10 issues identified by NRC	11/89*	Complete
2) Develop and implement a "simplified review process" for selected stored items procured under past dedication processes in safety-related applications. Use of or upgrading to NCIG-07 standards as part of the abbreviated review would not be required.	12/89	See Note 2
3) Review and resolution of the sample of 50 past procurements evaluated by the independent consultant (CYGNA)	3/90	Complete
4) Engineering review to determine if additional sampling is necessary	12/89	Complete (See Note 3)
5) As part of the NUMARC initiative to establish a dedication program to meet the criteria of NCIG-07, we will perform reviews of all reorders of items currently installed in the plant or in storage. Accordingly, the results of past procurements will be reviewed over an extended period. If any review identifies a mistake with past procurements; i.e., a hardware problem, we will conduct appropriate generic reviews as necessary.	Ongoing	Ongoing

EVALUATION OF COMMERCIAL GRADE PROCUREMENT PROGRAMS (Continued)

<u>Actions</u>	<u>Original Estimated Completion</u>	<u>Status As Of 3/31/90</u>
<u>Past Procurements</u>		
6) Complete additional sampling if needed (see item 4 above).	6/90	Not Required (See Note 3)
7) Reevaluate results of and need to continue the "simplified review process" (see item 2 above).	6/90	On Schedule

*Estimated completion date revised to March 1990 at November 1989 NRC/Supply System management meeting.

NOTES

- 1) A new procedure PPM 1.17.2 "Spare Parts Engineering Review" was POC approved in December 1989. This procedure, which is to replace the current PPM 1.3.39, will not be issued for implementation until other interfacing procedures are also revised and approved. This is expected to occur by June 30, 1990. The Spare Parts Engineering organization is currently performing commercial grade procurement evaluations using PPM 1.3.39, as deviated May 1989. With the procedure deviation to PPM 1.3.39, we meet the intent of NCIG-07 requirements. However, since the responsibility for performing commercial grade dedications has been moved to Generation Engineering, additional procedure development is required and is underway. Procedure interpretation has been provided by guidance memoranda issued to the Spare Parts Engineering staff. Training to the requirements of the deviated procedure and guidance memoranda, plus additional on-the-job training, has been provided to those performing evaluations.
- 2) Assessment plan prepared in January 1990. Implementation of the plan called for a random sample to review additional commercial grade material in storage for suitability of commercial grade dedication process. This work is in process.
- 3) The engineering review concluded that additional sampling was not required from a statistical viewpoint.

