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 50-397/90-09.

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May 29, 1990  
G02-90-095

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 90-09  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated April 26, 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

TCM/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 at the site during the periods of January 29 - February 8, 1990, and February 27 - March 9, 1990, a violation of NRC requirements was identified. In accordance with "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

WNP-2 Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained, "covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A of Regulatory Guide 1.33, specifically addresses operating procedures for, "Malfunctions of the Pressure Control System," and the "Inability to Drive Control Rods."

Contrary to the above:

- A procedure did not exist that covered a specific malfunction of the pressure control system, namely, depressurization due to failure of the Digital Electro-Hydraulic Control System.
- Emergency Procedure, "Reactor Power Control" PPM 5.1.3, provided insufficient procedures for an operator to locally mitigate the inability to drive control rods.

This is a Severity Level IV Violation (Supplement 1).

### Validity of Violation

The Supply System does not acknowledge the validity of this violation for the following reasons:

- 1) While the Supply System acknowledges that more detailed procedural guidance could have been provided for RPV depressurization due to a failure of the Digital Electro-Hydraulic Control System, we do not agree that no procedural guidance existed for this particular failure of the DEH System. Plant design features, combined with the symptomatic-based Emergency Operating Procedures to provide necessary guidance, were utilized to ensure that this malfunction would be appropriately addressed. Main Steam Isolation Valves (MSIVs) automatically close on low RPV pressure (831 psig) or are manually closed by procedural direction (PPM 5.1.1, "RPV Level Control") when RPV pressure goes below 831 psig (a condition requiring MSIV isolation). The specific scenario or sequence of events provided by this procedural guidance, which existed prior to our approval of a new procedure PPM 4.2.1.14, on February 15, 1990, is as follows:
  - DEH failure occurs (i.e., valves open) causing a reduction in RPV pressure.

- When RPV pressure drops to 831 psig, MSIVs automatically close and the associated reactor scram occurs (including annunciation).
- Operators enter Emergency Operating Procedures which, among other things, require the operators to initiate a manual MSIV isolation if it did not automatically occur.
- The automatic or manual MSIV isolation stops the uncontrolled RPV depressurization and the Emergency Operating Procedures, combined with the normal Plant Operating Procedures, provide the necessary direction to control the reactor from this point on.

The event-specific procedural guidance which did not exist prior to February 15, 1990 was guidance to be used if the operator noticed the RPV pressure reduction before receiving the first annunciation for this event (i.e., MSIV isolation due to RPV pressure below 831 psig). This procedure, PPM 4.2.1.14, "Inadvertent RPV Depressurization", was implemented on February 15, 1990, to provide added specific procedural direction. The Supply System does not agree with the NRC's conclusion that the requirements of Regulatory Guide 1.33, which require procedures be prepared and implemented for malfunctions of pressure control systems, were not being met as described in the NOV.

- 2) Regulatory Guide 1.33, Revision 2, February 1978, Appendix A (Section 6) states that WNP-2, "should prepare as appropriate, procedures for combating emergencies and other significant events." Item (m.) under this section identifies "inability to drive control rods" as one condition for which procedures should be prepared, as appropriate. From an overall perspective relative to Item (m.) of Reg. Guide 1.33, PPM 5.1.3, "Reactor Power Control", (written to the BWROG-EPGs) does meet the requirements of the Reg. Guide. This procedure provides thirteen different actions/methods to reduce reactor power and shutdown the reactor in the event control rods fail to automatically insert when required.

Inspection Report 50-397/90-09 stated that the specific problem with PPM 5.1.3, "Reactor Power Control" (resulting in the conclusion the Reg. Guide 1.33 criteria was not being met) was, "inadequate guidance for performing the task of locally inserting a hydraulically locked control rod in the event that all other means of attempted rod insertion had failed." Our position is that the balance between the level of detail in the procedure and the level of detail of the training provided to perform that procedure were adequate. It is our position that, so long as the combination of level of procedural detail and the scope/level of detail of the training results in the consistent ability of the procedure user to correctly perform the task, the level of procedural guidance is adequate. In this specific instance, the operator did perform the observed task correctly. The Supply System has also identified an OJT task describing the field

activities necessary to perform CRD emergency overpiston venting. All plant Equipment Operators must demonstrate proficiency for this task prior to being assigned to Reactor Building rounds. Furthermore, continuing training for Equipment Operators ensures that proficiency for performing this task is maintained.

In conclusion, we believe that issuance of a Severity Level IV violation is not warranted for either of the items.

Corrective Steps Taken/Results Achieved

Not applicable

Corrective Action to be Taken

Not applicable

Date of Full Compliance

The Supply System is currently in full compliance.