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SUBJECT: Amended response to Generic Ltr 83-28, Item 2.2.2 & response
 to Generic Ltr 90-03 re vendor interface.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 28, 1990
G02-90-161

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
AMENDED RESPONSE TO GENERIC LETTER 83-28 (ITEM 2.2.2)
AND RESPONSE TO GENERIC LETTER 90-03 REGARDING VENDOR
INTERFACE FOR SAFETY RELATED COMPONENTS (TAC 60758 & 76314)

- References: 1) Letter, G02-83-1076, GC Sorensen (SS) to A Schwencer (NRC), "Response to Generic Letter 83-28", dated November 18, 1983
- 2) Letter, G02-85-257, GC Sorensen (SS) to WR Butler (NRC), "Generic Letter 83-28, Additional Information", dated May 17, 1985
- 3) Letter, "Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2 Vendor Interface for Safety-Related Components (Generic Letter 90-03)", dated March 20, 1990
- 4) Letter, "Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2 Vendor Interface for Safety-Related Components (Generic Letter 90-03, Supplement No 1)", dated May 14, 1990

In reference letters 1 and 2 the Supply System provided responses to Item 2.2.2 of Generic Letter 83-28 regarding vendor interface for safety related components. The NRC has not responded to these two submittals with regard to Item 2.2.2. In Generic Letter 90-03 (References 3 and 4) the NRC provided an amended staff position for this item. A 180 day response was requested as to whether or not the Supply System has taken the actions requested in the letter. The purpose of this letter is to provide that response.

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AMENDED RESPONSE TO GL 83-28 (ITEM 2.2.2) & RESPONSE
TO GL 90-03 REGARDING VENDOR INTERFACE FOR SAFETY
RELATED COMPONENTS

Generic Letter 90-03 concludes that an adequate vendor interface program should include:

- (a) *A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. This program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSS vendor; and*
- (b) *A program of periodic contact with the vendors of other key safety-related components not included in (a) above.*

The Generic Letter also established requirements for safety related work performed by outside vendors and contractors.

Response to item a and the recommendations of the VETIP: The Supply System has attended, and will continue to attend, regular meetings with the NSSS vendor including BWR owners group meetings. Problems in the design and operation of NSSS supplied systems and components are discussed at these meetings. Ideas for achieving improvements in equipment, procedures and training and ideas for anticipating problems in these areas are discussed. Information provided at these meetings in terms of printed material is distributed within the Supply System according to distribution list organized by subject material (e.g., pump shaft cracking, valve erosion and emergency procedure guidelines).

The Supply System receives directly from the General Electric Company Service Information Letters (SILs) and Rapid Information Communication Service Information Letters (RICSILs). The receipt, review and implementation as required for these documents is controlled within the Supply System by PPM 1.10.4, "External Operational Experience Review". This is the same procedure that is used to control the review of NRC IE Bulletins and Notices as well as selected INPO documents. By this procedure and through the Operating Experience Assessment Program, each SIL and RICSIL must be reviewed for applicability to WNP-2 and for the identification of appropriate corrective actions. Corrective actions identified are tracked by the Plant Tracking Log (PTL) until completed. The Operating Experience Assessment Program and the PTL tracking of its identified corrective actions are audited by quality assurance groups.

Response to Item b: The Supply System response to this item will consist of the following three elements:

1. The Supply System maintains a Contractor/Vendor Information (CVI) file system to insure that vendor information received by WNP-2 for safety related components is controlled for use through the life of the plant. The CVI file is indexed on equipment part number. The file contains engineering, test and maintenance information that was obtained during procurement and construction. Typically, this information is contained in Operating and Maintenance Manuals.

AMENDED RESPONSE TO GL 83-28 (ITEM 2.2.2) & RESPONSE
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RELATED COMPONENTS

Receipt of vendor information for incorporation into these manuals is controlled by PPM 1.6.3, "Vendor's Operating and Maintenance Manuals." Part of the process by which receipt of new manuals and inserts for existing manuals are controlled by this procedure requires that the new material be reviewed by the Plant Technical Staff, Generation Engineering, Operations and Maintenance to confirm the completeness and technical adequacy of the information provided and to determine if any modifications and/or changes in maintenance may be required of the system or component.

2. By PPM 1.10.4, discussed above, the Supply System also reviews letters that are received from vendors that are not changes to an Operating and Maintenance manual. Such letters that contain information on potential defects in services, analyses or equipment provided the Supply System; recommendations for operation or maintenance of supplied equipment and 10CFR21 notices are entered into the Operating Experience Assessment Program and forwarded to the Operating Experience Assessment Department for review. A letter that provides information on maintenance and/or the need to make a modification to a system or component would be entered into the program for review. Any corrective actions that might come from the review would be tracked by the PTL as discussed above.
3. The Supply System will develop a program to make a good faith effort to contact selected vendors of key safety related systems and components not covered by the NSSS vendor effort discussed above in response to item a. The safety related batteries, inverters and diesel generators will be considered as key components. In addition, safety related electrical switchgear, pumps, valve operators and other components and systems will be identified as key components and systems if their failure would significantly degrade the ability to maintain the reactor coolant pressure boundary and/or prevent or mitigate the consequences of accidents that have the potential to result in significant offsite consequences. For example, such equipment that is important to ECCS injection would be identified as key components whereas some ECCS instrumentation might not if its failure alone would not degrade injection. A safety related battery charger might not be considered as a key component if it is not found to be important to accident prevention and/or mitigation. Components that would satisfy these criteria but that have a very reliable performance history and are of simple design (e.g., instruments such as resistance temperature detectors) would not be identified as key components. The identification of systems and components important to accident prevention and mitigation and the determination of component reliability will use the current industry PRA data base and information obtained from the ongoing WNP-2 plant specific PRA and Reliability Centered Maintenance (RCM) programs.



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AMENDED RESPONSE TO GL 83-28 (ITEM 2.2.2) & RESPONSE
TO GL 90-03 REGARDING VENDOR INTERFACE FOR SAFETY
RELATED COMPONENTS

The WNP-2 Reliability Centered Maintenance Program is a currently scheduled thirty month program being performed under contract with General Physics Corporation. It will include use of the RCM Database System and Equipment Failure Database developed by General Physics. The General Physics Corporation's approach to RCM considers industry and WNP-2 plant specific historical equipment failure data and performs Failure Modes and Effects Analyses (FMEA) to identify equipment with significant failure modes in order to establish the recommended preventive maintenance tasks and frequencies. The FMEA identifies key components by identifying the effect of failure at the local, system and unit level. The results of this process will also be useful in identifying the key components to be included in the WNP-2 Generic Letter 83-28, Item 2.2.2 program. Additionally, inadequate CVI are identified during component analysis.

Annual contact will be attempted with the vendor of each key system and component with the issuance of a form letter being the primary method of contact. Records of these contacts will be maintained in auditable files. Any concerns learned from these contacts will be entered into the Operating Experience Assessment Program described above for evaluation and identification of corrective action. This establishment of the annual contact will be controlled by PPM 1.6.3 discussed above.

For those cases where the vendor is no longer in business or is not responsive, the Plant Technical Staff will be informed so that need for additional action can be determined. In addition the following elements of our existing program will be of assistance in dealing with these situations:

On an industry wide basis: review of industry experience through the Operating Experience Assessment Program and the use of the Nuclear Plant Reliability Data System.

On a plant specific basis: The identification and documentation of WNP-2 specific problems by PPM 1.3.12, "Plant Problems - Problem Evaluation Request". This PPM provides for the identification of system and component deficiencies that result in the system or component not performing per design requirements in a manner that could affect plant safety, capacity or availability. This program includes the requirement to perform a root cause analysis which provides the identification of trends that would identify a basic problem with a particular piece of vendor supplied equipment.

If an active owners group exists for a component or system that includes concerns similar to those discussed above for the BWR owners group (e.g., a diesel generator or motor operated valve group) and the Supply System was an active participant in the group, then this may be considered to serve in place of the annual contact.

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AMENDED RESPONSE TO GL 83-28 (ITEM 2.2.2) & RESPONSE
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RELATED COMPONENTS

Quality Assurance Programs for Vendors

Generic Letter 90-03 also requires that a licensee have a program which assures that quality assurance programs for design, maintenance or modification work performed on safety related equipment by outside vendors or contractors are properly implemented.

The Supply System's procurement program requires that vendors of safety related equipment or services either have a quality assurance program approved by the Supply System or they are required to work to the Supply System's quality assurance program. The purchase orders and contracts include these requirements.

The Supply System confirms that the vendor interface program described above in response to item a is implemented. The Supply System also confirms that parts 1 and 2 of the response to item b are implemented although minor changes to the referenced PPMs and supporting procedures and instructions remain to be accomplished. These will be accomplished by October 31, 1990. Part 3 of the response to item b remains to be implemented. The procedure changes and initial list of key safety related components and systems will be in place to allow this process to begin by December 31, 1990.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

AGH/JMG/bk

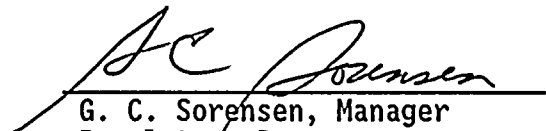
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STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: GENERIC LETTER 90-03


I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE: 28 SEPT, 1990


G. C. Sorensen, Manager
Regulatory Programs

On this date personally appeared before me G. C. SORENSEN, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 28th day of September 1990.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Richland, WA
My commission expires 7/14/91



