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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 18, 1991
G02-91-078

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 91-04
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated March 19, 1991. 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 - Winston & Strawn
PL Eng - NRR
DL Williams - BPA/399
NRC Site Inspector - 901A

9104230299



APPENDIX A

During an NRC inspection conducted on January 14 - February 17, 1991 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 (1990), the violation is listed below:

Technical Specifications, Section 4.6.5.3 states: "Each standby gas treatment (SGT) subsystem shall be demonstrated operable:

"b. At least once per 18 months...by:

"(1) Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions...C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978..."

Contrary to the above, the in-place penetration and bypass leakage testing was not accomplished in accordance with Regulatory Guide 1.52, in that the required injection and sample manifolds were not used during tests of the downstream HEPA filters and charcoal adsorbers which were performed (1) on January 24, 1991; September 19, 1989; and April 1, 1988 for the "A" train of SGT, and (2) on January 30, 1991; September 21, 1989; and April 1, 1988 for the "B" train of SGT.

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

Validity of Violation

The Supply System acknowledges the validity of this violation in that surveillance testing of the Standby Gas Treatment (SGT) System downstream HEPA filters and the charcoal adsorbers was not performed in compliance with the Technical Specifications.

The reasons for the violation were 1) less than adequate work practices, 2) less than adequate procedures, and 3) less than adequate supervisory oversight. During the preparation of the original surveillance procedures, the detailed methodology required to satisfactorily conduct the surveillance tests was not effectively documented or communicated to the procedure writer, and the writer also did not check to see if the procedures met the intended objectives. The surveillance test procedures did not contain the requirement or the direction to test the downstream HEPA filters and charcoal adsorbers in a manner required by the Technical Specifications. Furthermore, information pertaining to the correct methodology for conducting the tests was not retained when responsibilities for performing the tests were changed. Although management programs were in place during the 1983-1984 time-frame to detect these deficiencies, they were not effectively implemented at that time when the procedure revisions occurred. Subsequent management programs were also not effective in identifying these deficiencies.

Corrective Steps Taken/Results Achieved

1. The surveillance procedure for testing the charcoal adsorbers was temporarily deviated to allow for the charcoal adsorbers to be tested in accordance with Technical Specification requirements. The deviation assured adequate testing by clearly identifying the sample points for concurrent testing of the charcoal beds. Successful testing of the charcoal adsorbers was completed on January 29, 1991.
2. The surveillance test procedure was temporarily deviated to allow for the downstream HEPA filter to be tested in accordance with Technical Specification requirements. The deviation assured adequate mixing in the air-aerosol stream by removal of the upstream HEPA filter during testing of the downstream HEPA filter, and using the same injection point used for the upstream HEPA filter. Successful testing of the downstream HEPA filter was completed on February 2, 1991.
3. On March 1, 1991 Licensee Event Report 91-003 was submitted pursuant to the requirements of 10CFR50.73 (a)(2)(i)(B) because the Standby Gas Treatment System surveillance testing was not in compliance with the Technical Specifications. However, this LER addressed only the fact that the downstream HEPA filters were not being tested in accordance with the Technical Specifications. It was not recognized, until the Notice of Violation was issued and subsequent reviews were performed, that the charcoal adsorbers were not being tested in accordance with the Technical Specifications prior to changing the procedure on January 29, 1991.
4. All other Plant surveillance procedures associated with charcoal adsorber and HEPA filter testing were reviewed to ensure that those procedures included adequate direction to meet the requirements of Regulatory Guide 1.52. No additional inconsistencies with Technical Specification surveillance procedures were noted.
5. Changes have since been made to the procedural administrative control process. Specifically, a procedural verification and validation process has recently been implemented. Verification is the process of confirming and documenting the technical accuracy and written correctness of Plant procedures. Validation is the evaluation performed to determine that Plant procedures provide adequate guidance to the procedure user and to ensure proper operation/maintenance of Plant equipment.

Corrective Action to be Taken

1. The surveillance test procedures are in the process of being formally revised to include the proper method of testing the charcoal adsorbers and HEPA filters. These procedures are PPM 7.4.6.5.3.5, "SGT System HEPA Dioctylphthalate (DOP) Test and Visual Inspection," and PPM 7.4.6.5.3.6, "SGT System Adsorber Bypass Leakage Test." Additional procedural enhancements are also being made to ensure consistency of future test performances.
2. LER 91-003 will be revised to include the failure to test the charcoal adsorbers in accordance with the Technical Specification requirements.

Date of Full Compliance

Full compliance was achieved on January 29 and February 2, 1991 respectively when 1) the procedures were temporarily deviated to correctly reflect the Technical Specification-required method for testing the charcoal adsorbers and downstream HEPA filters, and 2) the tests were successfully performed.



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SUBJECT: Responds to NRC 910319 ltr re violations noted in insp rept
 50-397/91-04 on 910114-0217. Corrective actions: Surveillance
 test procedures being revised & LER 91-003 revised to
 include failure to test charcoal absorbers within Tech Spec.

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Date of Full Compliance

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