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 AUTH. NAME AUTHOR AFFILIATION
 BAKER, J.W. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 MARTIN, J.B. Region 5 (Post 820201)

SUBJECT: Provides revised basis for operation during annual maint &
 refueling outage, clarifying issues from discussions w/NRC on
 910412.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 12, 1991
G02-91-075.

Docket No. 50-397

J. B. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

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REGION V

Dear Mr. Martin:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
BASIS FOR OPERATION DURING ANNUAL MAINTENANCE
AND REFUELING OUTAGE, REVISION 1

On April 9, 1991 the Supply System provided the NRC our Basis for Operation during the 1991 Maintenance and Refueling Outage. This basis is being revised to clarify issues from discussions with NRC Region V on April 12, 1991. In addition, on April 11, 1991 the Supply System provided the NRC information that the start of the 1991 Maintenance and Refueling Outage would be delayed for up to one week. This morning, it was determined that the Division 1 Diesel Generator is inoperable, due to an abnormally high level of particulate contamination in oil samples taken from both generator bearing oil reservoirs. As a result, the Plant will be shut down as originally scheduled.

On March 14 and 22, 1991 the Supply System provided the NRC our Basis for Continued Operation following the failure of our requalification program and one crew during the Operational Evaluation. The Supply System will shut down WNP-2 as previously scheduled for our Annual Maintenance and Refueling Outage on April 13, 1991 and plans to restart the Plant the first week of June, 1991. This Basis for Operation will be in effect for the time period during the Outage when the Plant is shut down in Operational Modes 4 "Shutdown" or 5 "Refueling". The Mode Switch may be moved to other Operational Modes for short periods to accommodate surveillance and test activities.

The following actions will be taken during the Outage to ensure safe operation of WNP-2. This document has been reviewed with Senior Supply System Management and has received Plant Operating Committee review and approval.

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1. A four shift rotation will be utilized during the Outage period while shut down in Operational Modes 4 (Shutdown) or 5 (Refueling). As a minimum, each shift will have three licensed Senior Reactor Operators (SROs) (two of which are assigned to the Control Room) and two licensed Reactor Operators (ROs) assigned to the Control Room. This crew composition exceeds WNP-2 Plant Technical Specification requirements which require one SRO and one RO. In addition, the strengths and capabilities of each individual crew member was evaluated, and crew adjustments were made to balance each crews strengths and capabilities. The shift period will be 8 hours. See Attachment 1 for Crew composition.
2. Additional support will be provided to the Control Room Operating Crew by Reactor Operators in the remediation program. These Operators will perform tasks normally assigned to a licensed operator, but for which, in accordance with the definitions of 10CFR55.4, a license is not required. In addition, these Operators may perform licensed operator tasks when under the direct supervision and in the presence of a licensed Reactor Operator. See Attachment 2 for the details.
3. Additional support will be provided to the Shift Manager by Shift Managers in the remediation program. This support will consist of such functions as Work Package pre-approval and closure, paper closeout, administrative restart activities, and valve lineup approval. This support is provided to relieve the Shift Manager of some administrative burdens.
4. Refueling floor activities, including Core Alterations, will as required by WNP-2 Plant Technical Specifications be observed and supervised by Licensed Senior Reactor Operators. Two of the four currently assigned Refuel Floor Supervisors are SROs who are in the remediation program. The testing deficiencies of the two SROs in the remediation program have been evaluated as being limited to dynamic simulator accident event response. Therefore, based on our evaluation and the fact that the WNP-2 Plant Technical Specifications specifically make allowances for SRO Licenses limited to fuel handling we consider these individuals licensed for fuel handling. The fuel handling license qualifications for the two SROs in remediation will be provided on Monday April 15, 1991.
5. The Outage Refuel Floor Coordinator responsible for overall activities on the Refuel Floor during the 1991 Maintenance and Refueling Outage is a Shift Technical Advisor. This individual passed the 1991 Supply System/NRC requalification examination even though his SRO license is currently inactive.
6. The overall scope of the Spring 1991 Maintenance and Refueling Outage is well defined and reduced from past outages. The impact of the Division 1 Diesel Generator problem is still being assessed. Refueling Floor activities planned for this Outage are limited to new fuel loading, spent fuel off loading, a reshuffle of fuel, and a reshuffle of control rod blades. Except for the reshuffle of control rod blades these are routine activities performed many times at WNP-2.

7. Our management oversight of Control Room activities will be performed on a daily basis during the Outage period and includes:
 - a. One individual from the management oversight group will be present in the Control Room during critical Plant evolutions.
 - b. As a minimum, two backshift surveillances will be performed each week.
 - c. In addition, the Management Walkthrough Program will continue as scheduled. This is a program begun in December 1988 that pairs a Plant Manager or Supervisor with a Manager not involved in the day-to-day operation of the Plant. The purpose of the walkthroughs is to provide an opportunity for increased communication between Corporate Management and Plant personnel. Additional, benefits involve observations for possible improvements in operations, maintenance, equipment and safety.
8. Plant QA monitoring of Control Room activities will continue on a frequency of at least one surveillance every other day during the Outage period. As a minimum, one backshift surveillance will be performed each week.
9. Sufficient time will be provided for those SROs and ROs in the remediation program to successfully complete the program and to be retested prior to Plant restart.

The Supply System is confident that it can maintain safe operation of WNP-2 with these administrative controls during the Outage period. Each of the four shift crews is staffed to exceed the minimum Technical Specification staffing requirements and each crew is comprised of experienced operators. The scope of the Outage does not include any unusual or abnormal conditions which could be overly challenging to Plant personnel. Our management and Quality Assurance oversight will continue and during these oversight tours if we determine the capabilities of the control room staff are jeopardized we will take immediate action to alleviate the situation.

Very truly yours,

J. W. Baker

J. W. Baker
WNP-2 Plant Manager

slw/bk
Attachments

cc: Document Control Desk
NS Reynolds - Winston & Strawn
PL Eng - NRC

DL Williams - BPA/399
NRC Site Inspector - 901A

ATTACHMENT 1

Outage Crew Composition

Name	Position	Crew	Name	Position	Crew
Mann	SM	A	Langdon	SM	E
Henderson	CRS	A	Rockey	CRS	E
Prescott	SSS	A	Hendrick	SSS	E
Blake	RO	A	Gregory	RO	E
Hughes	RO	A	Woods	RO	E
Becker	SM	B	Hancock	SM	F
Baird	CRS	B	Zimmerman	CRS	F
Rambo	SSS	B	Strote	SSS	F
Ramos	RO	B	Nelson	RO	F
Moore**	RO	B	Hlavaty	RO	F

The NRC Resident Inspector will be notified of any permanent crew changes.

Licensed SRO Refueling Floor Supervisors are Taylor*, Gallagher, Bishop*, and Estes.

Control Room Support will be provided by Kappl*, Sawyer*, Conserriere*, and Kozlik*.

* In Remediation Program

** In discussion with NRC to remove from Remediation Program

INTEROFFICE MEMORANDUM

DATE: April 12, 1991

TO: J.W. Baker, Plant Manager (927M)

FROM: *D. McKay* for S.L. McKay, Operations Manager (9270)

SUBJECT: PROPOSED LIMITATIONS FOR OPERATORS REMOVED FROM LICENSED OPERATOR DUTIES AS A RESULT OF THE NRC APPROVED REQUALIFICATION EXAMS (REVISION)

REFERENCE:

It is my intention to utilize the licensed personnel that are presently in the "Remediation" process in support of the R-6 outage. These individuals have been removed from all licensed operator duties. This temporary change in status requires a definition of what job tasks these individuals "can" and "cannot" perform.

10CFR55 defines a licensed operator as an individual licensed under the code to manipulate the controls of a facility. Actively performing the function of an operator or senior operator means that an individual has a position on the shift crew that requires the individual to be licensed as defined in the Technical Specifications, and that the individual carries out and is responsible for the duties covered by that position.

"Controls" are defined as apparatus and mechanisms, the manipulation of which directly affects the reactivity or power level of the reactor.

PPM 1.3.1, "Conduct of Operations", states that manipulation of the Control Room "controls" is permitted by personnel adhering to the following requirements:

- 1) Only "active licensed personnel" shall manipulate or direct the manipulation of the "controls".
- 2) An individual in training for a license will be allowed to operate Control Room equipment consoles when properly supervised by a licensed Reactor or Senior Reactor Operator with the full knowledge of the operator "at-the-controls", the Control Room Supervisor and Shift Manager.
- 3) Inactive licensed personnel (RO or SRO) shall not manipulate reactor controls except under the direct supervision and in the presence of an individual who has an active license (RO or SRO).
- 4) Inactive SRO licensed personnel shall not direct manipulation of reactor controls unless directly supervised by and in the presence of an actively licensed SRO.
- 5) The provisions of 3) and 4) above are applicable to hot license training candidates and inactive licensed personnel participating in scheduled proficiency training.

J.W. Baker
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Manipulation of other than Control Room "controls" is permitted by personnel adhering to the following:

- 1) Equipment does not directly affect core reactivity.
- 2) Personnel are conducting authorized maintenance, surveillances, testing or installations by approved plant procedures.
- 3) Activities are conducted with the knowledge and approval of the operator "at-the-controls", Control Room Supervisor, and the Shift Manager.

For the purpose of the IOM, "Controls" that may directly affect reactivity or power level are listed as follows:

- Reactor Controls, (RMCS, RDCS, RPIS, RSCS, RWM)
- CRDMs (including HCU's, Accumulators, etc.)
- Nuclear Instrumentation (SRM's, IRM's, LPRM's, APRM's, RBM's)
- Reactor Protection System (including SDV, vents and drains, etc.)
- Mode Switch Interlocks
- Refuel Interlocks
- Reactor Recirculation System
- Standby Liquid Control System (SLC)
- Control Rod Drive Hydraulics

Included with this list of controls are surveillances, tests and operations that may also directly affect reactivity or power level. These are as follows:

- | | |
|--------------|---|
| 7.4.0.5.12 | HY Valve Operability-Shutdown |
| 7.4.0.5.13 | PI-VX and Tip Valve Operability |
| 7.4.1.3.1.1 | Scram Discharge Volume Vent & Drain Valves Operability |
| 7.4.1.3.1.2 | Control Rod Exercise |
| 7.4.1.3.5.1 | Control Rod Scram Accumulator Operability |
| 7.4.1.3.6.1 | CRD Coupling Integ (After Core Alterations & Maintenance) |
| 7.4.1.4.1.1 | Rod Worth Minimizer Precritical Check |
| 7.4.1.4.1.2 | Rod Worth Minimizer Operability Prior to Shutdown |
| 7.4.1.4.2.1 | RSCS Operability Prior To Startup |
| 7.4.1.4.2.2 | RSCS Operability Prior to Shutdown |
| 7.4.1.5.1 | SLC Vlv Alignment/Squibb Vlv-CC (Monthly) |
| 7.4.1.5.3 | SLC Pumps Operability Test (Quarterly) |
| 7.4.3.1.1.22 | Manual Scram Functional Test |
| 7.4.3.1.1.9 | MSIV Closure Scram Functional |
| 7.4.3.6.9 | Intermediate Range Monitor Channel C-CFT |
| 7.4.4.1.2 | Jet Pump Operability |
| 7.4.4.6.1.1 | RPV Temperature Pressure Log |
| 7.4.9.1 | Refuel Interlock |
| 7.4.9.10.1 | CR or CRD Removal Prerequisites |
| 7.4.10.1.1 | Reactor Power/Coolant Temp During Low Power Physics |

J.W. Baker
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7.4.9.3	CR Insert Verification Prior To Core Alt
7.4.9.6	Refuel Platform Crane & Hoist Interlock
7.9.3.9	Rod Coupling Verification Following Full-Out

The above list provides exceptions to those jobs or tasks that can be performed by personnel that have been temporarily removed from licensed duties during the ongoing remediation process. These personnel will be on shift in support of the operating crews during the R-6 outage.

The Reactor Operators in this category will be allowed to perform operations on all Control Room panels with the exception of P-603 (Reactivity Control Panel). They will perform Control Room logkeeping, surveillance testing, clearance order preparation, review and implementation, procedure writing and review, system and component lineups (valves and power supplies) and other normal functions that do not include systems and components listed as exceptions above.

The Senior Reactor Operators in this category will be allowed to perform normal planning and coordination of work activities including surveillance testing, authorization and approval of clearance orders, locked valve deviations, jumpers and lifted leads, and maintenance work requests. They can review and revise procedures, coordinate valve lineups, pre-approve work packages, close-out paper work and coordinate the administrative restart process.

The direction, authorization and approval of these activities will be limited to those systems and components not listed as exceptions above.

It is understood that the list of exceptions may not be all inclusive. Other exceptions or concerns will be dealt with on a case-by-case basis.

It is the responsibility of Operations Department Management and the individual Shift Managers to ensure that only active licensed operators manipulate or direct manipulation of "controls" as described in 10CFR55 and the WNP-2 Technical Specifications.

bap