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SUBJECT: Responds to NRC 910718 ltr re violations noted in insp rept
 50-397/91-18. Corrective actions: NOV included as topic of
 discussion during Licensed Operator Regualification
 Training Program.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 19, 1991
G02-91-155

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 91-18
RESPONSE TO NOTICE OF VIOLATIONS

The Washington Public Power Supply System hereby replies to the Notice of Violations contained in your letter dated July 18, 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 violations are addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

G. D. Bouchey
G. D. Bouchey, Director
Licensing & Assurance

REF/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
PL Eng - NRR
DL Williams - BPA/399
NRC Site Inspector - 901A

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Appendix A

During an NRC inspection conducted on May 13 - June 23, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

"a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A of Regulatory Guide 1.33, Section 1.c, lists a procedure for "Equipment Control (e.g. locking and tagging)."

PPM 1.3.8C, Danger Tag Clearance Order (Manual), Revision 0, Section 4.2.18, states, "Independent Verification is required when the component is SAFETY RELATED (QC 1)...". PPM 1.3.8A, Caution Tag Order, Revision 0, Section 6.B.2.c.(6), states in part, "If work is associated with Safety-Related...Systems, an independent verification of component position is required by a second qualified individual."

Contrary to the above, on May 24, 1991, the following clearance orders on safety related systems had not received independent (second) verification:

<u>Clearance Order No.</u>	<u>System</u>
91-6-C005 (Caution)	Containment Atmospheric Control
91-5-C094 (Caution)	Reactor Core Isolation Cooling
91-5-C004 (Caution)	Inverter No. 3
90-9-C021 (Caution)	High Pressure Core Spray
90-12-C084 (Danger)	Leak Detection System

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reasons for the violation included Procedure Not Followed Due to Misused Checklist and Supervisory Oversight Less Than Adequate. The procedures were incorrectly applied in determining the independent verification requirements of safety related equipment. In addition, supervisory oversight was less than adequate to identify the incorrect determination of the verification requirements during the review and approval process of the above tag orders.

Corrective Steps Taken/Results Achieved

The above tag orders were immediately changed to require an independent verification and the verifications were subsequently performed.

Corrective Action to be Taken

- 1) This NOV will be included as a topic of discussion during the Licensed Operator Requalification Training Program and the requirements and responsibilities of independent verification of safety related equipment will be emphasized.
- 2) Applicable tag order procedures will be revised to clarify the responsibilities of the Shift Manager.

Date of Full Compliance

Full compliance was achieved when all of the required independent verifications were performed for the above tag orders.

- B. Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented and maintained covering the activities referenced below:

"g. Fire Protection Program implementation."

PPM 1.3.10, Revision 11, Fire Protection Program, states in part:

"10.0 FIRE PROTECTION SYSTEM IMPAIRMENT CHECKLIST

"10.1 Required when:

"10.1.6 Leaving a normal closed fire door or damper in open position."

Contrary to the above, on May 13, 1991, normally closed fire door R402 at the northeast corner of the 522' level of the reactor building was propped in the open position and a Fire Protection System Impairment Checklist had not been provided.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reasons for the violation included Training Less Than Adequate and Supervisory Oversight Less Than Adequate. Although the Supply System General Employee Training manual did provide instruction to obtain a Fire Protection System Impairment Permit prior to starting any work which breaches a fire barrier (e.g., propping open a fire door), the class room instruction did not emphasize the requirements for fire door impairment permits. Also, contractor safety training of the temporary contract personnel did not adequately emphasize the procedures and requirements

related to fire protection system impairments. Plant procedure (PPM) 1.3.10, "Fire Protection Program," requires a Fire Protection System Impairment Permit when leaving a normally closed fire door open. In addition, supervisory oversight was less than adequate because the supervisor failed to ensure the appropriate Fire Protection System Impairment permits were obtained for the job site.

Corrective Steps Taken/Results Achieved

The Plant Fire Marshal immediately toured the plant and found two additional open doors. Immediate actions were taken to obtain Fire Protection System Impairment permits.

Corrective Action to be Taken

- 1) Applicable training will be revised to provide more emphasis on the procedure and requirements for obtaining a fire protection system impairment permit.
- 2) A memo will be issued to Plant and site support contractor craft supervisors to ensure that all necessary fire protection system impairment permits will be obtained prior to starting work.

Date of Full Compliance

Full compliance was achieved May 13, 1991 when fire door R402 was closed and Fire Protection System Impairment Permits were obtained for fire doors C-214 and R408.