WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

March 19, 1992
G02-92-069

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 91-46
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated February 21, 1992. 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.

Sincerely,

L. L. Grumme, Acting Director
Licensing & Assurance (Mail Drop 280)

DAS/bk
Attachments

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

APPENDIX A

During an NRC inspection conducted on December 9, 1991 - January 23, 1992, 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 (1991), the violation is listed below:

A. Technical Specification section 4.6.1.4.c.2 states, in part:

"Each MSIV leakage control system subsystem shall be demonstrated operable:

c. At least once per 18 months by:

1. Verifying that the blower develops at least the below required vacuum at the rated capacity:

a) Inboard valves, 17" H2O at 30 scfm.
b) Outboard valves, 17" H2O at 30 scfm."

Plant Procedures manual (PPM) procedure PPM 7.4.6.1.4.3 implements these surveillance requirements.

Contrary to the above, PPM 7.4.6.1.4.3 did not require that 30 scfm be established for the performance of TS surveillance 4.6.1.4.c.2, and when PPM 7.4.6.1.3 was performed on May 16, 1991, the required 30 scfm blower capacity was not obtained for either train of the Main Steam Isolation Valve Leakage Control System.

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

Validity of Violation

The Supply System acknowledges that the surveillance procedures used to test the Main Steam Isolation Valve Leakage Control (MSLC) system did not require that 30 scfm fan flow be established, and that the fans did not develop the required 30 scfm flow rate at -17" water gauge pressure during the last performance of the fan test. Failure to satisfy the Technical Specification requirements resulted in the MSLC system being technically inoperable from the time of issuance of the Operating License until the granting of a Technical Specification waiver of compliance by the NRC Staff on January 16, 1992. This condition was previously addressed in LER 92-002.

The MSLC Inboard and Outboard train fans are sized to handle five times the design MSIV leakage. The Technical Specification allowable leakage for the MSIVs is 11.5 scfh per valve when tested at 25 psig, or a total of 46 scfh. Five times the allowable MSIV leakage is thus 230 scfh, or 3.83 scfm. Both the surveillance procedure and the test procedure used to test the system during initial startup testing recorded cfm, as read directly from the installed system instrumentation, instead of scfm. These procedures did not correct the cfm readings for air density to obtain scfm. Thirty cfm is approximately 27 scfm at typical MSLC system test conditions. The test results are thus very conservative compared to the design bases for the system. The procedures provided assurance that the outboard MSLC system was and is capable of performing its intended safety function.

The root causes for the failure to test the MSLC fans to the Technical Specification scfm requirements were: 1) when the change from cfm in the Standard Technical Specifications to scfm in the WNP-2 Technical Specifications was made in the development of the Plant specific Technical Specifications prior to Plant licensing, the change implementation process in place at the time did not provide for verification that revision to scfm was consistent with the WNP-2 design; and 2) the surveillance procedure was less than adequate in that it contained technical inaccuracies which did not satisfy the Technical Specification requirements.

The cover letter which transmitted Inspection Report 91-046 requested that the Supply System address, in this Notice Of Violation (NOV) response, the use of a Technical Specification Interpretation (TSI) in relation to this subject and our plans for handling similar issues in the future. The TSI in question was approved by the Plant, but based on a concern raised by members of the NRC Regional staff and a subsequent re-evaluation by Plant personnel, this TSI was canceled prior to being issued for use.

The decision to develop a TSI in relation to MSLC fan flow was based on both the technical details and wording of the Technical Specification criteria relative to the MSLC system design basis, and similarities to a recent issue where a TSI was successfully applied. The Supply System TSI process is based on the fundamental precept that TSIs must not involve a change or exception to the Technical Specification requirements. The Supply System recognizes that in this instance the TSI inappropriately resulted in a lessening of the Technical Specification requirement. Additionally, the Supply System should have been more pro-active in its' communication with NRC Region V and NRR when this concern was first identified.

The Supply System uses TSIs to provide additional clarity on Technical Specification requirements to help ensure compliance with the Technical Specifications is maintained. The Supply System intends to meet both the procedural and regulatory requirements as they apply to Technical Specification amendments and TSIs. The Supply System will work to ensure future TSIs do not result in a lessening of the Technical Specification requirements.

Corrective Steps Taken/Results Achieved

The changes which caused this failure to meet the Technical Specification requirements occurred under Technical Specification change management and procedure development processes in place prior to Plant licensing. These processes have been significantly improved based on experience. The programmatic controls which exist today should prevent a similar event from occurring. No programmatic changes are planned in response to this event.

A Technical Specification waiver of compliance was requested and received which allows continued operation with a 30 cfm MSLC fan flow rate at 17 inches of water gauge vacuum instead of 30 scfm.

A Technical Specification Amendment request under emergency basis conditions was submitted to the NRC on January 21, 1992 to change the required flow rate test criterion for the MSLC fans from 30 scfm to 30 cfm. This amendment was approved by the NRC on March 13, 1992. A review was also performed for other Technical Specifications which cite scfm to ensure the surveillance test procedures correctly addressed scfm and reflect the FSAR assumed conditions. This review resulted in finding a problem with the Standby Gas Treatment system which was verbally reported in accordance with 10CFR50.72 and will be reported in an LER in accordance with the requirements of 10CFR50.73.

Corrective Action to be Taken

As documented in WNP-2 LER 91-013-02, a Quality Action Team has been authorized to recommend potential improvements in the Technical Specification surveillance program.

Date of Full Compliance

WNP-2 was in full compliance upon issuance of the Technical Specification waiver of compliance by the NRC staff on January 16, 1992. In addition, the Plant was in compliance with the Technical Specification requirements, without reliance on the waiver of compliance, when the Technical Specification amendment to allow performance of MSLC fan testing at 30 cfm was approved by the NRC on March 13, 1992.

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SUBJECT: Responds to NRC 920221 ltr re violations noted in insp rept 50-397/91-46.Corrective actions:Standby Gas Treatment sys which was verbally rept in accordance w/10CFR50.72 & will be reported in an LER w/requirements of 10CFR50.73.

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IE01

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