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SUBJECT: Responds to NRC 920505 ltr re violations noted in insp rept
 50-397/92-01.Corrective actions:degraded voltage calculation
 2.12.58 will be completed.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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June 4, 1992
G02-92-135

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 92-01
RESPONSE TO NOTICE OF DEVIATIONS

The Washington Public Power Supply System hereby replies to the Notice of Deviations contained in your letter May 5, 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 Deviations are addressed with an explanation of our position regarding validity, corrective action and date of corrective action completion.

Very truly yours,


L. L. Grumme, Acting Director
Licensing & Assurance

JDA/bk
Attachments

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

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APPENDIX A

During an NRC inspection conducted from January 13, 1992 through February 14, 1992, deviations from NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the deviations are listed below:

- A. WNP-2 Final Safety Analysis Report, Paragraph 8.3.2.1.7.1 committed that periodic maintenance tests of the station's safety batteries would be performed in accordance with IEEE 450-1975. Paragraph 3.4 of IEEE 450-1975 specified that an equalizing charge be given to a battery every time specific gravity of one cell dropped more than 0.01 below the average of all cells.

Contrary to the commitment above, as of February 14, 1992, this requirement had not been performed, nor had it been implemented in any of the station's safety battery procedures.

Validity of Deviation

The Supply System acknowledges the validity of this deviation. The reason for the deviation is related to change management and the cause was determined to be Change Related Documents Not Revised in that the Final Safety Analysis Report (FSAR) was not modified to take exception to certain recommendations of IEEE Standard 450-1975.

The WNP-2 FSAR commitment is to perform periodic maintenance tests on safety-related batteries in accordance with IEEE Standard 450-1975. However, when the original procedures were written in 1983, the decision was made to follow the additional guidance of IEEE Standard 450-1980 and manufacturer's recommendations pertaining to battery cell equalizing charges. The updated standard contained the recommendation to perform an equalizing charge when an individual cell is more than 0.010 points below the average of all cells. However, guidance was also provided in the updated standard that, "These items indicate conditions that, if allowed to persist for extended periods, can reduce battery life. They do not necessarily indicate a loss of capacity." Furthermore, manufacturer's guidance pertaining to lead calcium batteries (the type installed at WNP-2) is such that 1) overcharging could reduce the life of a battery, and 2) individual cell specific gravity below the average of all cells does not indicate a degradation of the cell or the battery unless it was significantly low and the cell voltage was affected.

Accordingly, to maintain the integrity of the safety-related batteries, the decision was made to not incorporate into Plant procedures the recommendation to perform an equalizing charge if the specific gravity of an individual cell is more than 0.010 points below the average of all cells. However, the decision was not formally documented and the FSAR was not updated to reflect this position. In addition, the FSAR was also not updated to reflect those other recommendations of IEEE Standard 450-1975 that were not being fully implemented. These additional provisions had not been implemented because it was concluded the actions were also not technically warranted. However, the FSAR should have been appropriately revised.

Corrective Steps Taken/Results Achieved

There was no immediate corrective action taken pertaining to this deviation.

Corrective Action to be Taken

A Safety Analysis Report Change Notice (SCN) will be prepared to revise the FSAR to accurately describe the intent of the Supply System's commitment to IEEE Standard 450. The SCN will provide the basis for not implementing those provisions of IEEE Standard 450-1975 that were determined to be not technically warranted.

Date of Corrective Action Completion

The SCN will be prepared by July 31, 1992 and the follow-up revision to the FSAR will be included as part of the annual update process (no later than October 1992).

- B. On December 15, 1988, as documented in a January 5, 1989, letter from Robert B. Samworth to Mr. G. C. Sorensen, the Supply System committed to submit a separate Technical Specification amendment requesting new setpoints for the degraded voltage protection circuitry at WNP-2.

Contrary to the above, as of February 14, 1992, the Supply System had not submitted a separate Technical Specification amendment requesting new setpoints for the degraded voltage protection circuitry.

Validity of Deviation

The Supply System acknowledges the validity of this deviation. The reason for this deviation is also related to change management and the cause was determined to be Change Not Implemented in a Timely Manner in that a higher priority was not assigned for completion of the degraded voltage calculation to allow for submittal of the Technical Specification Amendment Request.

A draft internal Technical Specification Amendment Request and SCN (88-042) were initiated in December of 1988, but the documentation could not be formally submitted until such time that the degraded voltage calculation (Calculation 2.12.58) was finalized. Although completion of the calculation to date has involved extensive efforts to evaluate all Class 1E loads at all voltage levels, the planned schedule for completion was not maintained due to competition from other emergent priority work. In addition, an expected final date for submitting the amendment request had not been established by the Supply System.

However, the calculation should have been completed in a more timely manner and a Technical Specification Change Request submitted to update the adjusted degraded grid voltage setpoint values.

Corrective Steps Taken/Results Achieved

Improvements have been made to the manner in which commitments to regulatory agencies are tracked since the time-frame when the commitment was made to revise the Technical Specification pertaining to degraded grid voltage. The Corporate Licensing Department currently reviews all incoming and outgoing regulatory correspondence for commitments. The commitments identified are then entered into a computerized data base for tracking and follow-up (due dates are also assigned to these commitments). Since January 1992, a report of new open commitments has been issued to responsible managers and individuals on a monthly basis.

Corrective Action to be Taken

Degraded Voltage Calculation 2.12.58 will be completed, the FSAR will be revised accordingly and a formal Request for Amendment to the WNP-2 Technical Specifications will be submitted to the NRC.

Date of Corrective Action Completion

1. The calculation will be completed by June 30, 1992.
2. The Technical Specification Amendment Request will be submitted to the NRC for review by August 14, 1992.
3. The follow-up revision to the FSAR will be included as part of the annual update process (no later than October 1992).