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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 24, 1992
G02-92-174

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 92-13
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 25, 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.

Very truly yours,


L. L. Grumme, Acting Director
Licensing & Assurance

RJP/bk
Attachments

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

920730164

APPENDIX A

During inspections conducted on April 27 - May 1, May 10 - 15, and May 18 - 22, 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, the violation is listed below:

- A. Technical Specification 6.8.1, states in part, that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A recommends the following:

Section 1(e) Review and Approval of Procedures
Section 7(e) Radiation Protection Procedures for Contamination Control
Section 8(b) Specific Procedures for Radiation Monitor Calibrations

Radiological Services Instruction (RSI) 0.1, "RSI Manual Administration," Section 5.13, requires in part that the licensee's Corporate Radiological Support Services (CRSS) group ensure that RSI procedures required by the Technical Specifications are reviewed and approved by appropriate supervision prior to use.

Plant Procedure manual (PPM) 1.2.1, "Plant Procedures Manual Description," requires in part that WNP-2 procedures be developed, approved, and implemented to ensure that plant activities are conducted in accordance with Supply System and regulatory requirements.

Contrary to the above:

- (1) From February 1988 to May 1992, the licensee's CRSS group performed personnel contamination monitor calibrations using a procedure, RPI 12.24, "Operation and Calibration of the IPM-7A Installed Personnel Contamination Monitor," which had not been reviewed and approved by appropriate supervision.
- (2) As of May 1, 1992, the licensee's WNP-2 health physics/chemistry, and instrument & controls maintenance departments had not established, developed, implemented or maintained approved procedures for calibrating installed personnel contamination monitors (IPMs).

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



Validity of Violation

The Supply System acknowledges the validity of this violation. Radiological and instrument calibration instructions for installed personnel contamination monitors (IPMs) located on the main plant site had not been formalized within plant procedures. Further, the Corporate Radiological Support Services (CRSS) procedure for calibration of IPMs that are located outside the boundaries of the main plant site did not receive proper review and approval prior to implementation.

CRSS maintains responsibility for calibration of IPMs that are not located on the main plant site. Radiation Protection Instruction (RPI) 12.24, "Operation and Calibration of the IPM-7A Installed Personnel Contamination Monitor," was written to provide radiological and instrument calibration instructions for these IPMs. This procedure had been assimilated into the CRSS procedure manual and was used on several occasions to perform IPM calibrations despite the fact that it had not been properly reviewed or approved.

The root cause for use of RPI 12.24 in an insufficiently reviewed and approved condition was inadequate supervisory methods for tracking the status of this procedure. CRSS supervisory personnel were knowledgeable that RPI 12.24 existed, and that it had been incorporated into the procedure manual; however, they were not aware that the procedure had not been approved. Discovery of this error during routine procedure reviews was obscured in part by the unapproved status of the procedure, which prevented it from appearing on the CRSS procedure tracking log.

With respect to calibration instructions for IPMs located on the main plant site, it was previously believed by plant staff that testing of the IPMs beyond that already being performed in existing channel checks and functional tests was not required due to the automatic and comprehensive nature of self-diagnostic features associated with the IPMs. This belief was reinforced, in part, by the manner in which information was presented in the IPM vendor manual.

Although there is a dedicated section of the IPM vendor manual that provides guidance with respect to the scheduling and type of routine checks that should be performed to ensure that the IPMs are operating properly, this section does not specifically identify any calibration activities. The root cause of failure to establish calibration procedures for IPMs located on the main plant site was inadequate analysis of IPM testing requirements. A contributing factor was informational deficiencies in written documentation provided with the IPMs.

We believe that the scope of checks and testing previously performed was adequate to prevent the external spread of contamination. As stated in the inspection report, the combined results of previous functional checks, contamination smear measurements, and calibration records demonstrate that both the plant and offsite IPMs were operating properly at the time of inspection, despite the fact that calibration instructions for these instruments had not been procedurally formalized.

Corrective Steps Taken/Results Achieved

Radiological Services Instruction (RSI) 12.24 (formerly RPI 12.24), "Operation and Calibration of the IPM-7A Installed Personnel Contamination Monitor," has been approved for use on a temporary basis.

Corrective Action to be Taken

Radiological Services Instruction (RSI) 12.24 has been submitted for formal review and approval, and will provide radiological and instrument calibration instructions for offsite IPMs. Additionally, a review of the CRSS procedure manual will be performed in order to identify if there are any other procedures that have not received proper approval.

Development of procedures PPM 10.24.218, "PM Cal/Test - Nuclear Enterprises America IPM-8," and PPM 12.13.35, "Radiological Calibration of In Plant Personnel Monitors (IPMs)," is in progress. These procedures will provide radiological and instrument calibration instructions for IPMs located on the main plant site. Calibration procedures for IPMs located offsite and on the main plant site will be developed to be mutually consistent with respect to technical content.

A condition similar to that previously described for the plant IPMs, whereby proceduralized calibration instructions were not established, was also identified with regard to radiological and instrument calibration of tool contamination monitors and instrument calibration of bag contamination monitors that are located on the main plant site. A radiological calibration procedure already exists for the plant bag contamination monitors. Procedures will be established to provide calibration instructions for these contamination monitors.

Date of Full Compliance

Completion of the CRSS procedure manual review, and formal approval of Radiological Services Instruction (RSI) 12.24, "Operation and Calibration of the IPM-7A Installed Personnel Contamination Monitor," are scheduled for September 30, 1992.

Completion of procedures PPM 10.24.218, "PM Cal/Test - Nuclear Enterprises America IPM-8," and PPM 12.13.35, "Radiological Calibration of In Plant Personnel Monitors (IPMs)," is scheduled for October 30, 1992. Radiological and instrument calibration procedures for plant tool contamination monitors and instrument calibration procedures for plant bag contamination monitors are scheduled to be complete by October 30, 1992.

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 GRUMME, L.L. Washington Public Power Supply System
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 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920625 ltr re violations noted in insp rept
 50-397/92-13 on 920427-920501, 10-15 & 18-22. Corrective
 actions: procedure re personnel monitor calibr & test under
 development & personnel contamination monitor installed.

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