

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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March 4, 1993  
G02-93-052

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
NRC INSPECTION REPORT 92-01  
REVISION OF RESPONSE TO NOTICE OF VIOLATIONS**

Reference: Letter G02-92-162, dated July 10, 1992, L.L. Grumme (SS) to NRC, "NRC Inspection Report 92-01 Response to Notice of Violations"

The reference submitted the Supply System response to the violations cited following the NRC Electrical Distribution System Functional Inspection. Page 6 of Appendix A of the referenced letter stated the following corrective action would be taken:

"Blanks marked "N/A" as being outside the scope of the original surveillance procedure are now required to be initialed by a Shift Manager. This requirement is being incorporated as a permanent change in PPM 1.5.1, Technical Specification Surveillance Testing Program, and in the interim has been implemented as a night order. The revision to this procedure is currently in the review and approval cycle."

The Supply System has implemented a revised corrective action. Plant Procedure PPM 1.2.3, Use of Controlled Plant Procedures, has been revised to implement this corrective action rather than PPM 1.5.1. Page 15 of Revision 19 to PPM 1.2.3 now contains a step 1. that reads as follows:

"If during performance it is desirable or necessary to not perform a step, it is acceptable to mark the step N/A provided the following is performed:

- For Maintenance personnel, the Craft Supervisor (if on-shift) concurs.

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- The Shift Manager concurs.
- The step is marked N/A and initialed by the performer.
- The step is annotated with an asterisk and a number (i.e., \*1, \*2, etc.). These numbers shall be used to tie the particular step to the associated comment in the Comments section.
- The Comments section is annotated with an asterisk and a number (i.e., \*1, \*2, etc.) for the associated step marked as N/A and the reason for the N/A is stated in the Comments section.
- For procedures without a Comments section, annotation and explanation should be made on the affected page."

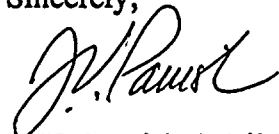
Section 5.3.5 discusses completion of the surveillance procedure containing steps which read as follows:

- "a. Notifying the Shift Manager, Control Room Supervisor and Control Room Operator when testing is complete and associated equipment/systems are returned to normal.
- e. A thorough review of the procedure by the Shift Manager to ensure:
  - All signoffs are complete and all required data has been taken, or steps are marked N/A and appropriately documented....

The Shift Manager's signature signifies compliance with the requirements listed in e. above."

The Supply System believes the changes made to PPM 1.2.3 are equivalent to the commitment made in response to Inspection Report 92-01 and will provide additional controls over the use of "N/A" in surveillance procedures.

Sincerely,



J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

CLF/bk

cc: JB Martin - NRC RV  
NS Reynolds - Winston & Strawn  
JW Clifford - NRR

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

