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 PARRISH, J.V. Washington Public Power Supply System
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SUBJECT: Responds to NRC 930128 ltr re violations noted in insp rept
 50-397/92-40. Corrective actions: instructional matl will be
 developed & training will be performed.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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March 1, 1993
G02-93-049

Docket No. 50-397

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

Gentlemen:

**SUBJECT: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 92-40
RESPONSE TO NOTICE OF VIOLATION**

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated January 28, 1993. 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.

In reviewing Inspection Report 92-40, two minor changes are needed on Page 3, in Section 5, Reliability Centered Maintenance (RCM). The first change is needed in the last sentence in paragraph 3, it should read, "... for a period of approximately nine months in early 1992; ...". A second change is needed in the first sentence in paragraph 4, it should read, "... who will provide the analysis for one system as a model ...".

Sincerely,

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

CLM/bk

Attachments

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

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9303120036 930301
PDR ADOCK 05000397
PDR

APPENDIX A

During an NRC inspection conducted November 16 through December 27, 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:

Section 6.8.1 of the Technical Specifications (TS) 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."

Regulatory Guide 1.33, Appendix A recommends a procedure for "h. Log Entries, Record Retention, and Review Procedures."

Plant Procedures Manual (PPM) 1.3.4, "Operating Data and Logs," implements these requirements, specifying in paragraph 4.14 that the Shift Manager's Log should include log entries for all potentially reportable occurrences, including plant management notification, and (in advance of the notification) any ESF or RPS actuation which is expected to result from a planned surveillance test or other evolution.

Contrary to the above:

1. On December 10, 1992, while performing surveillance procedure PPM 7.4.3.2.1.80, a full isolation of the Reactor Core Isolation Cooling (RCIC) system occurred, which was an Engineered Safety Features (ESF) actuation; this event was not logged in the Shift Manager's or the control room operator's log.
2. On December 22, 1992, the licensee notified the NRC Headquarters Operations Officer, pursuant to 10 CFR 50.72(b)(2)(vi), of a freon spill that had also been reported to the State of Washington; however, no entry was made in the Shift Manager's or control room operator's log concerning this notification.

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



Validity of Violation

The Supply System acknowledges the validity of this violation.

For item 1, the root cause was determined to be less than adequate training to recognize that the full Reactor Core Isolation Cooling (RCIC) system isolation, occurring on December 10, 1992 while performing surveillance procedure PPM 7.4.3.2.1.80, was an Engineered Safety Features (ESF) actuation.

The Shift Manager and Control Room Supervisor had recognized that the RCIC system was out of service as a consequence of the surveillance test in progress on December 10, 1992. From the Shift Manager's and Control Room Supervisor's viewpoint, the automatic isolation of RCIC-V-8 (outboard isolation valve) had no "additional" impact on plant operations. Furthermore, after RCIC-V-63 (RCIC Inboard Steam Isolation Valve) and RCIC-V-76 (RCIC Inboard Steam Supply Isolation Valve Bypass) were closed, as part of the surveillance test, the RCIC-V-8 low steam supply pressure automatic isolation was fully expected. This results from normal steam line header depressurization through the RCIC Steam Supply condensate removal system (steam traps). The Shift Manager and Control Room Supervisor, therefore, concluded that the surveillance test met the 10CFR50.72 non-reportability criteria of a "...pre-planned sequence during testing...", and was not noteworthy in their logs. This conclusion was reached even though the RCIC-V-8 isolation was not formally acknowledged as part of the surveillance test.

The Shift Manager's and Control Room Supervisor's conclusion, that the RCIC-V-8 isolation was not reportable to the NRC, was later found to be in error by the Management Review Committee. The RCIC-V-8 automatic isolation was determined to be reportable pursuant to 10CFR50.72(b)(2)(ii) as an anticipated, but not "pre-planned" automatic ESF actuation. Accordingly, the occurrence "should" have been immediately logged in the Shift Manager's Log and the Control Room Log. In response to Management Review Committee direction, the NRC was notified on December 14, 1992 at 1040 hours via the Emergency Notification System (ENS), and the notification was logged in the Shift Manager's Log. Corrective actions addressing the misinterpretation of the 10CFR50.72 reporting criteria are included in Licensing Event Report (LER) 92-045.

For the second item, the root cause was determined to be less than adequate verbal communication, in that, pertinent information was not properly transmitted to the Shift Manager. A contributing cause was that current administrative controls and procedures are less than adequate to ensure Shift Managers are cognizant of all NRC notifications via the Emergency Notification System (ENS).



A freon spill occurred on December 21, 1992, in which a Supply System employee was sprayed in the face, and subsequently transported to the hospital for observation. The employee was not seriously injured. The occurrence was well documented in the Shift Manager's Log and the Control Room Log. After a 24 hour follow-up spill report to the State of Washington, a Compliance Engineer made an NRC notification by telephone from his office pursuant to 10CFR50.72(b)(2)(vi), "Any event or situation, related to ... protection of the environment, for which a ... notification to other government agencies has been or will be made." After completion of the call to the NRC, the Compliance Engineer called the Shift Manager to inform him of the notification. However, following the telephone conversation, the Shift Manager was mistakenly under the impression that the NRC notification was a 'courtesy call' only, and not a formal notification. This was based on a previous Shift Manager's Log entry at 1640 on December 21, 1992. The log entry described the freon spill as being not reportable to the State of Washington, and therefore, not reportable to the NRC. Consequently, the Shift Manager did not make a log entry for the NRC notification. There were no administrative requirements to follow-up the verbal communications with confirming documentation to ensure the Shift Manager understood the purpose of the notification. In addition, there were no clearly defined procedural requirements to log the NRC notification. It is, however, Supply System Management's expectation that all NRC notifications concerning reportable and potentially reportable events be logged in the Shift Manager's Log.

Corrective Steps Taken/Results Achieved

1. In response to this Notice of Violation, a late entry was made in the Shift Manager's Log on February 23, 1993 for the NRC notification on December 22, 1993 pursuant to 10CFR50.72(b)(2)(vi).
2. The Operations Manager discussed the RCIC Isolation and Freon Spill events, logkeeping expectations and reportability with the operating crews. This action was completed on January 8, 1993.

Corrective Action to be Taken

1. Instructional material will be developed, and training will be performed, to ensure that licensed Operations personnel are knowledgeable of NRC reporting, and associated logkeeping requirements. Development of instructional material, and commencement of training for licensed Operations personnel is expected by March 8, 1993.
2. Instructional material will be developed, and training will be performed, to ensure that Operations personnel participating in Initial Operator License Training are knowledgeable of NRC reporting, and associated logkeeping requirements. Development of instructional material, and commencement of training for personnel participating in Initial Operator License Training is expected by September 30, 1993.



3. Licensing and Operations Management will evaluate current administrative controls and practices for NRC reporting via the Emergency Notification System. This will be completed by April 15, 1993.
4. Operations will revise PPM 1.3.4 to ensure Shift Managers log all NRC notifications concerning reportable and potentially reportable occurrences. This will be completed by March 30, 1993.

Date of Full Compliance

Full compliance of the violation was achieved on February 23, 1993 when the late entry in the Shift Manager's Log was made for the NRC notification on December 22, 1992 pursuant to 10CFR50.72(b)(2)(vi).

