



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 30, 1993
G02-93-102

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 93-08
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated March 31, 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.

Sincerely,

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

DAS/bk

Attachments

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

9305060189

Appendix A

During an NRC inspection conducted from February 8 through February 26, 1993, one 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. 10 CFR 50 Appendix B, criterion XVII, "Corrective Action" states in part that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, on February 8, 1993, conditions adverse to quality described in Quality Finding Report (QFR) 292-0041, issued May 18, 1992, had not been corrected. The QFR had identified nine instances where plant staff had failed to promptly identify conditions adverse to quality in accordance with plant procedures. The corrective actions for this QFR had not been completed on February 8, 1993, and there were several instances after May 18, 1992, where plant staff continued to fail to promptly identify conditions adverse to quality.

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

Validity of Violation

The Supply System acknowledges the validity of this violation in that prompt corrective actions were not implemented regarding the self identified failure to document Plant problems through the Problem Evaluation Request (PER) process. The Supply System believes that there is a typographical error in the Notice Of Violation and that criterion XVII should be corrected to criterion XVI. As stated in the Notice Of Violation this condition was identified through a Quality Finding Report (QFR) with the identified corrective actions being tracked to resolution. The Supply System failed to promptly implement each of the identified corrective actions, and the condition recurred.

Although a great deal of guidance is provided in PPM 1.3.12, Problem Evaluation Request, the successful implementation of the PER process at WNP-2 relies on personnel judgement and experience to determine if and when the requirements of PPM 1.3.12 are met and a PER is required. As such, implementation is impacted by perceived management expectations. In fact, the decision to write a PER is typically discussed with supervision prior to the PER being written. As such, the corrective actions for the QFR focused on increasing the sensitivity of management and supervision to senior management expectations relative to PER generation.

The root causes for the failure to take prompt corrective action were twofold. First, management methods were less than adequate in that there was inadequate sensitivity and priority by Plant Management to Quality Assurance organization findings and associated corrective actions. Second, supervisory methods were inadequate in that although aware of the overdue action items, the Plant Quality Assurance organization failed to provide proper emphasis on follow up and resolution of the overdue corrective actions.

Corrective Steps Taken/Results Achieved

A memorandum was issued from the Assistant Managing Director, Operations requiring that Operations Directorate supervisory personnel Performance Plan Worksheets include specific goals regarding quality and timeliness of corrective actions.

A memorandum providing senior management expectations relative to PER generation, along with specific examples, was issued to all WNP-2 personnel on April 26, 1993.

Corrective Action to be Taken

The Plant Quality Assurance organization will develop a plan to improve prioritization, tracking, and follow up on corrective actions resulting from QFRs. This plan and an associated implementation schedule will be completed by May 21, 1993.

Personnel Performance Plan Worksheets for Operations, Engineering, and Quality Assurance Directorate supervisory personnel will include specific goals regarding quality and timeliness of corrective actions. This action will be completed by September 30, 1993

The Supply System is reviewing problem identification programs from other nuclear plants in an effort to identify and implement process improvements. This review will be completed by June 11, 1993. An implementation schedule for identified process improvements will then be developed and procedure PPM 1.3.12, Problem Evaluation Request, will be revised to provide a more concise program to deal with conditions adverse to quality.

Date of Full Compliance

The Supply System is not aware of any unresolved conditions or significant conditions adverse to quality for which a PER has not been written. Should any conditions be identified where a PER is required but has not been generated, a PER will be generated immediately. A heightened sensitivity within the Quality organizations has resulted in significant uncompleted QFR corrective actions being elevated to senior management. The Supply System will be in full compliance with completion of the personnel Performance Plan Worksheets on September 30, 1993.



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 AUTH. NAME: PARRISH, J.V. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 930331 ltr re violations noted in insp rept
 50-397/93-08. Corrective actions: plant QA organization will
 develop plan to improve prioritization, tracking & follow up
 on C/As resulting from Quality Finding Rept.

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Appendix A

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