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AUTH.NAME AUTHOR AFFILIATION
PARRISH,J.V. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 930325 ltr re violations noted in insp rept
50-397/93-07.C/As:line mgt has initiated frequent plant
walkdowns to ensure compliance w/PPM 1.3.19 & to provide
immediate feedback to upper mgt.

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May 13, 1993
G02-93-111

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 93-07 REVISED
RESPONSE TO NOTICE OF VIOLATION

Reference: Letter G02-93-094 dated April 23, 1993, JV Parrish (SS) to NRC, "NRC Inspection Report 93-07 Response to Notice of Violation"

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

This revision to the referenced Notice of Violation response is being submitted to correct an error that was brought to our attention by NRC Region V personnel. In the original reply, Item No. 5 under "Corrective Steps Taken/Results Achieved" in Appendix A incorrectly took credit for generating several punchlist items attached to Problem Evaluation Request (PER) 293-0318. These items were actually generated by NRC Resident Inspectors and submitted to the Supply

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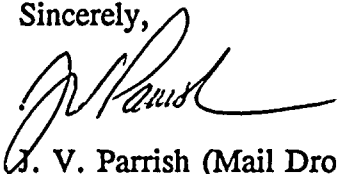


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**NRC INSPECTION REPORT 93-07 REVISED
RESPONSE TO NOTICE OF VIOLATION**

System for corrective action. This error was caused by the wording in the PER "Problem Description" and the handwritten punchlist attachment being misconstrued to indicate a finding by plant personnel. The PER items were thought to have included items ". . . discovered during management housekeeping tours." Because the handwritten punchlist was submitted directly to the PER originator by the NRC Resident Inspectors, and as management housekeeping tours were known to be ongoing at the time, the NOV author and reviewers assumed the PER punchlist attachment was a product of the management tours. The source of the PER punchlist was not verified during the root cause analysis investigation because the PER only contained more evidence of noncompliance, and was not significant in establishing the root cause or developing effective corrective actions to be taken. This revision corrects the error referenced above by indicating that the PER 293-318 punchlist items were discovered during NRC Resident inspections.

Sincerely,



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

CDM/bk

Attachments

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

Appendix A

During an NRC inspection conducted February 16 - 22, 1993, 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 requires that written procedures shall be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Section 7, references "Procedures for Control of Radioactivity."

Licensee Procedure PPM 1.3.19, "Plant Material Condition Inspection Program," provides instructions for the control of liquid radioactivity.

PPM 1.3.19, Section 4.2.11(a), "Rubber/Tygon Hose Tagging," requires in part that:

All Rubber and Tygon hoses used in the Power Block to route equipment drains, vents, leaks, pump from sump to sump, etc. shall be tagged with a "Work in Progress" Tag.

Contrary to the above, the following hoses were in use in the Power Block to route equipment drains, leaks, pump from sump to sump without the required "Work in Progress" Tag:

- (1) On February 18, 1993, a Tygon type drain line was routed from the liquid radwaste floor drain (LRW-FDR) collection process piping to the Turbine Bldg. T-3 sump.
- (2) On February 18, 1993, a pump and hose was routed from the Reactor Bldg. equipment drain (EDR) P5 sump to the Reactor Bldg. FDR P4 sump.
- (3) On February 20, 1993, a hose was connected to a "B" Reactor Feed pump leak that was routed to the Turbine Bldg. T-5 LRW-FDR sump.
- (4) On February 20, 1993, a hose was connected to Fuel Pool Cooling valve FPC-V-103, and routed to a floor drain.

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



Validity of Violation

The Supply System acknowledges the validity of this violation.

Two root causes for this violation have been identified:

1. Change management was less than adequate. There was no backfitting plan, schedule or requirement specified by management to tag and log previously existing temporary plant drain and sump hoses before implementation of PPM 1.3.19, Revision 13.
2. Managerial methods were less than adequate. PPM 1.3.19, Revision 13, was issued and placed into effect without management ensuring WNP-2 was consistently in full compliance.

Administrative Procedure PPM 1.3.19, Revision 13, Plant Materiel Condition Inspection Program, was approved on December 18, 1992, by the Plant Operating Committee (POC) and placed on administrative hold. This revision was a corrective action for the non-radioactive Turbine Building sump violation identified in NRC Inspection Report 50-397/92-35, and the findings of Problem Evaluation Request (PER) 292-1279. The revision required all non-permanent plant equipment, including "All Rubber and Tygon hoses used in the Power Block to route equipment drains, vents, leaks, pump from sump to sump, etc. . . .," to be tagged with a "Work in Progress" tag. An additional requirement was that the "Installation or removal of hoses inside the power block will be recorded in a log maintained in the Radwaste Control Room."

The procedure revision was placed on administrative hold by POC to allow time for personnel to be trained on the new procedural requirements and to achieve pre-issue compliance. This "hold" period allowed Plant Area Coordinators to identify and correct items of noncompliance during their weekly "general" and monthly "in-depth" housekeeping inspections as required by the then current revision (Revision 12) of PPM 1.3.19. This also allowed Department Managers time to perform their monthly housekeeping tours and ensure deficiencies were properly identified, prioritized and forwarded to the Assistant Plant Manager according to PPM 1.3.19, Revision 12.

On January 18, 1993, eleven days before the procedure was to be issued, the Plant Manager sent an Interoffice Memorandum (IOM), "IMPLEMENTATION OF NEW REVISIONS TO ADMINISTRATIVE CONTROL PROCEDURE 1.3.19," to WNP-2 managers and supervisors informing them of the revision. This IOM was intended to ensure that plant personnel were properly trained on the new requirements of PPM 1.3.19, Revision 13, and included a summary of the changes and his expectations for training of personnel to support procedure implementation.



On January 28, 1993, PPM 1.3.19, Revision 13, was signed by the Plant Manager, and issued on January 29, 1993. The Supply System had committed in the Notice Of Violation (NOV) 92-35 response to establish a hose control program by February 1, 1993, and this procedure revision met that commitment. However, the Supply System had not adequately implemented the new program requirements. Although steps were taken to prepare for the new procedural requirements of the program, personnel training and compliance verification by plant supervision had been inadequate to properly implement it. Additional time constraints placed on plant staff due to their involvement in restart efforts during the successive forced outages of January and February, 1993, and procedural requirements that proved to be more restrictive than necessary also negatively affected program implementation effectiveness. Furthermore, plant management and POC did not recognize the deficiencies in the program implementation, and released PPM 1.3.19, Revision 13 from administrative hold without adequate basis.

In reviewing Inspection Report 93-07, there is a statement that "Operations, also, revealed that no Hose Control Log existed in the Radwaste Control Room as described in PPM 1.3.19." Contrary to this statement, interviews with Radwaste Control Room personnel suggest that a log did exist at the time of the NRC inspector tours conducted on February 18 and 20, 1993. Several Radwaste Control Room personnel said that they personally made several hose log entries. The hose logging requirement was deleted from the procedure on February 25, 1993, due to being excessively restrictive. The log was subsequently discarded because there was no procedural requirement for retention in permanent plant records.

Corrective Steps Taken/Results Achieved

1. In response to Notice of Violation 93-07, and a February 24, 1993, IOM, "IMPLEMENTATION OF NEW REVISIONS TO PPM 1.3.19," from the Assistant Plant Manager, line management was asked to conduct walkdowns to ensure compliance with the procedure revision.
2. On February 26, 1993, PPM 1.3.19, Revision 13, was deviated to make it less restrictive, and more reasonable (and enforceable) based upon feedback from field walkdown groups.
3. Following the line management walkdowns, the Plant Manager asked Supply System Quality Assurance to conduct an assessment of the material tagging requirements of PPM 1.3.19.
4. On March 2, 1993, Quality Assurance initiated PER 293-238 to address their findings that approximately ten percent of the 92 hoses inspected were not tagged with a "Work in Progress" tag, and a significant number of tags were not filled out in strict compliance with procedural requirements.

5. On March 22, 1993, PER 293-318 was initiated to address punchlist items of noncompliance with PPM 1.3.19 discovered during NRC Resident inspections.
6. On April 1, 1993, Quality Finding Report (QFR) 293-0008 was issued describing the findings of the Quality Assurance Surveillance initiated to assess compliance with PPM 1.3.19.
7. An IOM was issued to "all employees" on April 22, 1993, clarifying the requirements for "Work In Progress/Hose Control" tags.

Corrective Action to be Taken

1. Currently, line management has initiated frequent plant walkdowns to ensure compliance with PPM 1.3.19 and provide immediate feedback to upper management. Continued emphasis on tagging nonpermanent plant equipment is ongoing, however, instances of noncompliance are still being identified. Drain and sump hoses found without "Work in Progress" tags will be removed and appropriate corrective action will be taken. These plant walkdowns will continue until sustained performance is achieved.
2. PPM 1.3.19 will be revised by June 1, 1993, to incorporate recommended clarifications and improvements identified.
3. The Supply System will develop a guide by June 15, 1993, to be used as an aid in planning and implementing major changes to WNP-2 established methodology.

Date of Full Compliance

WNP-2 will be in full compliance on August 1, 1993, following revision of PPM 1.3.19 and verification to ensure consistent compliance.

