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SUBJECT: Responds to NRC 930609 ltr re violations noted in insp rept
50-397/93-13.C/As: licensee will conduct followup audits no
later than 930901, assessing plant personnel performance re
surveillance procedure documentation & procedure adherence.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 9, 1993
602-93-178

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 93-13
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 9, 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

CDM/bk

Attachments

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

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Appendix A

During an NRC inspection conducted on March 30 through May 10, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion V states, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Section 6.8.1 of the Technical Specifications states, in part:

"Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- c. Surveillance and test activities of safety-related equipment."

Paragraph 5.1.2 of Plant Procedures Manual (PPM) 1.2.3, Revision 19, "Use of Controlled Plant Procedures," states, "plant personnel are responsible for operating, maintaining, and testing plant equipment and systems per applicable plant procedures at all times."

PPM 1.2.3, Revision 19, Paragraph 5.1.5, states, "If an existing procedure [which] addresses the activity to be performed is incorrect...it shall be corrected per PPM 1.2.3 or PPM 1.2.4 and then used."

PPM 1.2.3, Revision 19, Paragraph 5.3.5 states, "completion [of the procedure] consists of the following...

- e. A thorough review by the Shift Manager to ensure...all signoffs are complete and all required data has been taken, or marked N/A and appropriately documented...and all acceptance criteria has been met or appropriate Technical Specifications Actions Statements have been entered."

Contrary to the above:

1. In PPM 7.4.3.7.4.10, Revision 4, performed on April 7, 1993, the craftsman entered as-found and as-left values of 11.1 feet in Table 7.1a and 11.0 feet in Table 7.1b (data tables for two level instruments associated with the "B" spray pond), although the table lists the acceptable range as 11.75 to 12.25 feet (an incorrect range --the acceptable range should have been listed as 10.75 to 11.25

feet). The craftsman signed off step 7 of Sections 7.1 and 7.2 of the procedure, respectively, signifying that all values in Tables 7.1a and 7.1b were within the stated tolerance. The Shift Manager and craft supervisor reviewed and signed the procedure to indicate complete and satisfactory test performance.

2. In PPM 7.4.8.1.1.2.1, Revision 19, performed on April 4, 1993, section 7.5, steps 80 and 81 required the operator to record the level of DO-TK-1A in feet and inches and then convert this value to gallons, based on the table in Attachment 9.4. The operator entered 11 feet zero inches, which corresponds to 57,251 gallons in the table of Attachment 9.4. However, the operator entered 57,635 gallons in step 81, a non-conservative value that was not found anywhere on the table in Attachment 9.4. The Shift Manager and craft supervisor reviewed and signed the procedure to indicate complete and satisfactory test performance.
3. In PPM 7.4.8.2.1.20, Revision 10, performed on April 7, 1993, the craftsman entered comments that stated that electrolyte level was high and an engineer's concurrence was necessary to determine if the battery cell was satisfactory. No resolution to these comments was documented. The Shift Manager and craft supervisor reviewed and signed the procedure to indicate complete and satisfactory test performance.
4. In PPM 7.4.8.2.1.20, Revision 10, performed on April 7, 1993, the craftsman entered comments stating that sedimentation levels were high for battery cells 6 and 11, and that an engineer's concurrence was necessary to conclude that the battery cells were satisfactory. No resolution was provided for these comments. The Shift Manager and craft supervisor reviewed and signed the procedure to indicate complete and satisfactory test performance.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The root cause of the multiple examples of procedure completion deficiencies was a lack of attention to administrative details. Reviews of pertinent information and interviews with the involved utility craft and supervisory personnel verified that, in each case, plant equipment was operable and satisfied the surveillance requirements. However, plant management's expectation of "strict adherence" to administrative details associated with procedure performance completion is not being consistently met. Procedural paperwork and reviews are not being completed in a thorough enough manner to meet plant documentation standards.



Since procedure adherence problems continue to occur, the numerous previous corrective actions implemented by Supply System management to resolve this issue have not been completely successful. It is evident that special attention must be given to the associated administrative aspects of procedure compliance. The corrective actions described below are intended to produce the necessary improvements in this area. In addition, a self assessment audit will be conducted to assure that these corrective actions, as well as those previously established, were effective. The self assessment will also identify any other procedure adherence problem areas requiring special management attention.

Corrective Steps Taken/Results Achieved

1. The identified procedures were reviewed to assure plant equipment operability: WNP-2 Technical Specification compliance was verified in each case.
2. The utility craft and supervisory personnel involved in this violation were counseled on the corrections to their errors that were necessary to meet plant surveillance procedure completion and documentation standards.
3. An Interoffice Memorandum (IOM) was issued to Operations, Maintenance, Technical and Radiation Protection Departments on May 24, 1993, to reemphasize the uses of "N/A," asterisk/number and single line-out during procedure performance.
4. PPMs 7.4.8.1.1.2.1, 7.4.8.1.1.2.11 and 7.4.8.1.1.2.12 were revised to instruct the procedure user to read the fuel oil storage tank levels to the nearest inch (always rounding down) for the most conservative measurement.
5. PPM 7.4.8.1.1.2.12 was revised to change Attachment 9.3 to show the normal position of the Lube Oil Soakback Pump as "OFF" instead of "ON."

Corrective Action to be Taken

1. Conduct training for affected reviewers by August 31, 1993, on procedure requirements concerning review of completed procedures. This will include Shift Managers, Shift Engineers/Shift Technical Advisors and discipline supervisors with potential procedure review responsibilities.
2. Evaluate by October 31, 1993, the procedure completion review process to determine if the level of review and methodology are appropriate to assure adequate attention to technical and administrative details.
3. Conduct followup audits no later than September 1, 1993, assessing plant personnel performance concerning surveillance procedure documentation and procedure adherence.

A mechanism for trending progress will be established, as well as a method of feedback to the performers and reviewers. Audits will be conducted on a monthly basis for approximately four months, at which time the audit frequency and need to continue will be evaluated.

Date of Full Compliance

Each procedural administrative deficiency item identified in this Inspection Report was presented in the NRC Resident Inspector and Plant Manager meeting on April 22, 1993. The Plant Manager responded by assigning responsible discipline reviewers to rereview the associated procedures, then meet individually with the NRC Inspector by April 28, 1993, to compare findings. Full compliance was achieved for each item based on the discussions in those meetings.

- B. 10 CFR 50, Appendix B, Criterion V, and section 5.2.1 of the WPPSS Operational Quality Assurance Program Description (OQAPD) require that activities affecting quality be prescribed by drawings appropriate to the circumstances. WNP-2 Drawing E797 implements these requirements for the standby service water (SSW) pumphouse electrical chases.

Contrary to the above, on April 16, 1993, an activity affecting quality existed that was not described by drawings appropriate to the circumstances, in that Thermolag System 330 fire retardant material was used to protect cabling in the SSW pumphouse, but was not reflected in Drawing E797.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The Inspection Report stated that Thermolag was found during a tour of the "B" SSW pumphouse. A Supply System walkdown of the "A" and "B" SSW pumphouses conducted on June 18, 1993, found no Thermolag installations in the "B" SSW pumphouse. However, several Thermolag installations were found in the "A" SSW pumphouse for electrical separation barriers. Therefore, it is assumed that the NRC Inspector tour on April 16, 1993, was actually of the "A" SSW pumphouse.

Certain Thermolag installation configurations could cause elevated internal temperatures of the enclosed electrical power cables. This could cause premature aging of power cables supplying safety related equipment. In Licensing Event Report (LER) 86-033-02, the Supply System committed to perform a power cable ampacity derating evaluation on all electrical cabling protected by Thermolag. This was in response to original problems encountered with duct bank



cable derating and NRC concerns identified in NRC Region V Report No. 50-397/86-25-16. Based on this evaluation, calculations would be performed on scheduled raceway continuous power cables enclosed in Thermolag barrier installations that met certain configuration criteria. None of the Thermolag installations found during the Supply System walkdown of the "A" SSW pumphouse met the criteria for power cable ampacity derating calculations. Two spared cables and one instrument and control cable were found in the pumphouse that had Thermolag applications that met the configuration criteria. However, since they were not continuous power cables, they did not meet the criteria that requires performance of ampacity derating calculations. Accordingly, this violation had no impact on the safety related equipment located in the "A" SSW pumphouse. There is; however, a potential impact on safety related equipment located elsewhere in the plant.

Thermolag was applied in many places for electrical separation. Later reviews showed that it was not required. The electrical cables could still be in use, but no 10CFR50, Appendix R credit was taken for the Thermolag. These applications are not presently depicted on design drawings and may not exist in the design documentation data base. Previous walkdowns were performed to verify Thermolag applications for Appendix R criteria only or to verify electrical installations where the criteria did not require Thermolag. NonAppendix R (noncredited) Thermolag applications were not consistently incorporated into the design documentation data base or design drawings as there were no plant procedural requirements to include field installed fire barriers in design documents. The root cause of this violation was the lack of procedural requirements. This resulted in a condition where documentation was not available to assure that power cable ampacity derating calculations were performed in all cases where required.

The design documentation data base was used to meet the power cable ampacity derating evaluation commitments of LER 86-033-02. Since all noncredited Thermolag applications on power cables may not be documented, the ampacity derating calculations may not be complete. The April 13, 1993, response to NRC Generic Letter 92-08 takes credit for these original calculations. Consequently, as was pointed out by the NRC, the Generic Letter response may have been deficient.

Corrective Steps Taken/Results Achieved

1. Problem Evaluation Request (PER) 293-428 was initiated on April 23, 1993, to address the apparent inadequate power cable ampacity derating evaluation performed in response to NRC Generic Letter 92-08.
2. A Request for Technical Services (RFTS 93-03-066) was initiated on March 16, 1993, to update drawings to reflect as-built Thermolag tray installations in the "A" SSW pumphouse.

3. A revised response to NRC Generic Letter-92-08 was submitted on June 23, 1993, to include corrective actions to identify Thermolag installations not previously identified on design drawings.

Corrective Action to be Taken

1. Walkdown criteria for a Thermolag inspection will be developed by July 31, 1993.
2. Walkdowns will be performed by January 31, 1994, to identify noncredited Thermolag installations on power cables in accordance with the criteria developed by Engineering.
3. The Thermolag walkdown data will be incorporated into appropriate electrical design documents by June 30, 1994.
4. Power cable ampacity derating calculations will be completed by June 30, 1994.
5. No generic design documentation control corrective actions are seen as necessary. This deficiency is restricted to electrical design documents. Original plant documentation controls failed to fully incorporate Thermolag applications that were not required. The importance of documenting these applications was apparently not clearly understood. Documentation controls are in place to adequately maintain design documents current, and prevent recurrence of this deficiency.

Date of Full Compliance

Full compliance will be achieved on June 30, 1994, when electrical design documents will reflect the current Thermolag installation configurations that can impact power cable ampacity calculations.

