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Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 930625 ltr re violations noted in insp rept  
50-397/93-19.C/As: PPM 1.3.18 will be revised to provide  
consistent directions on how to log items in sufficient  
detail for purposes of identification.

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July 26, 1993  
G02-93-189

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 93-19  
RESPONSE TO NOTICE OF VIOLATION

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

This Notice of Violation, as described in Appendix A, consists of two examples. The Supply System acknowledges the validity of the second example. Additionally, the Supply System does not believe that this incident is a repeat violation (see Appendix A), as extensive corrective action was taken in response to violation 92-014-03 issued June 30, 1992. Following the 1992 Notice of Violation, the Supply System extensively revised Plant Procedure 1.3.18, "Foreign Material Control Around the Spent Fuel Pool, the Reactor Cavity, and Dryer-Separator Pit." This revision enhanced the previous controls for establishing and maintaining foreign material exclusion areas during both refueling and nonrefueling periods. Training was provided on the revised procedure to those personnel selected to be foreign material control watchpersons. In order to determine the effectiveness of these changes, the Supply System initiated a self-assessment that included direct observation of foreign material control practices.

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Page Two  
NRC INSPECTION REPORT 92-19  
RESPONSE TO NOTICE OF VIOLATION

This self-assessment identified several problems associated with implementing the new procedure. The majority of these problems dealt with logkeeping practices for material accounting. Corrective actions identified as a result of these problems included further procedure enhancements to incorporate lessons learned from the latest refueling outage. In spite of the problems identified, the self-assessment did conclude that improvements were evident in foreign material exclusion controls over the previous refueling outage. Furthermore, it is expected that the corrective actions identified from the self-assessment will further strengthen this program.

Sincerely,



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

KBL/bk  
Attachments

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



## APPENDIX A

During an NRC inspection conducted from May 24 through May 28, 1993, two examples of a violation 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 violation is identified below:

- A. Technical Specification 6.8.1 states that: "Written procedures shall be established, implemented and maintained covering ... applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 ..." Appendix A of Regulatory Guide 1.33 specifies procedures for procedure adherence, and refueling operations.

Plant Procedure Manual (PPM) procedure number 1.3.18, Revision 8, "Foreign Material Control Around the Spent Fuel Pool, the Reactor Cavity and the Dryer-Separator Pit," provides the requirements for control of foreign material in exclusion areas.

- (1) PPM 1.3.18, section 6.2.1.d requires that an item be moved out of the foreign material control boundary prior to any required disassembly when possible.
- (2) PPM 1.3.18, section 3.8 requires that tools used inside the foreign material exclusion boundary be marked, using vibro etching or other suitable permanent markings, with a number and that this number be used to maintain the inventory of the tools and to aid in providing positive identification in logging the tools into the Foreign Material Control Accountability Log.

Contrary to the above, on or about May 26, 1993, NRC inspectors observed the following:

- (1) An underwater camera was disassembled inside a posted Foreign Material Control Boundary, and associated loose parts (cap screws and a cover plate) were not controlled or attended. Disassembly of the camera outside the foreign material exclusion boundary was possible.
- (2) A review of the Refueling Floor Foreign Material Control Accountability Log sheets for May 25 through 27, 1993, noted six tools logged without a unique number for positive identification of the tools.

This is a Severity Level IV violation (Supplement I). This is a repeat of a violation issued on June 30, 1992.



### Validity of Violation

#### Example (1)

The Supply System does not acknowledge the validity of example (1).

On May 26, 1993, a contractor was working on the refueling floor. This work was being performed in the area set aside for underwater camera operation on the north side of the vessel. During his work, the underwater camera developed a malfunction that precluded its further use. The contractor told his Supply System supervisor that he wanted to inspect the camera before he finished work for the day.

The contractor judged it was permissible to disassemble the camera within the Exclusion Boundary. He understood that Health Physics personnel did not want to move items that had been in the core out of the area unless absolutely necessary to minimize the spread of contamination. This judgement was verified as correct by Licensing personnel during a July 22, 1993 interview with the cognizant Refueling Manager. Disassembly took place behind a 15" to 20" kickpanel installed near the perimeters of the Reactor Pressure Vessel (RPV) and Equipment Pool cavities. Thus, objects from the inspection could not be dropped into these areas.

During his inspection, the contractor found that the camera's thruster motor had burned out. He exited the bounded area, telephoned the supervisor from the refueling floor, briefly informed him of the problem, and asked the supervisor for a spare motor. The contractor knew of the procedural requirement to disassemble items outside the Exclusion Boundary when possible. However, it was judged to not be possible due to contamination concerns expressed by Health Physics. Although the Supply System recognizes that a better place to disassemble the camera was possible, considering the contractor's judgement and the concerns expressed by Health Physics, the Supply System believes that this example did not violate PPM 1.3.18.

#### Example (2)

The Supply System acknowledges the validity of example (2).

The root cause of example (2) was unclear and inconsistent wording in Procedure PPM 1.3.18. These inconsistencies consisted of conflicting information on how to make log entries on the associated Refueling Floor Foreign Material Control Accountability Log sheets. Specifically, a note in Section 3.8 states that "the use of these [vibro etched] tools does NOT prevent other tools that meet the lanyard and logging requirements from being brought in...." These inconsistencies led to the confusion which allowed personnel to believe they were in compliance with PPM 1.3.18.





The author of this procedure was interviewed on July 16, 1993. The author stated that, in retrospect, the procedure could be perceived as being contradictory in nature. However, the author attempted to write a procedure that was not overly prescriptive. In this manner, the author believed that he had written a flexible set of instructions that could be applied in a variety of situations to help maintain control of tools within the Exclusion Boundary.

Corrective Steps Taken/Results Achieved

Quality Assurance Surveillance Report 293-0018 was issued on July 14, 1993. This report summarizes the issues associated with refueling floor foreign material control and references corrective actions identified in PERs 293-0460, 293-0487, 293-0631, and 293-0679.

Corrective Action To Be Taken

PER 293-0679 previously identified a corrective action to revise PPM 1.3.18 using lessons learned from R-8. This is scheduled to be complete by October 1, 1993.

Additionally, PPM 1.3.18 will be revised to provide consistent directions on how to log items in sufficient detail for purposes of identification. This will be completed by October 1, 1993.

Date of Full Compliance

WNP-2 was in full compliance with the intent of PPM 1.3.18 on June 8, 1993. On May 28 and June 8, 1993 final Quality Assurance reviews of the Foreign Material Accountability Log confirmed that material had been accounted for during the refueling outage.

