



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

RECEIVED

NRC
REGION V

'93 AUG -5 AIO:18

July 30, 1993
GO2-93-198

Docket No. 50-397

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

Gentleman:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 92-41
AMENDED RESPONSE TO NOTICES OF VIOLATION

Reference: Letter GO2-93-096, dated April 26, 1993, JV Parrish (SS) to U. S. Nuclear Regulatory Commission "NRC Inspection Report 92-41 Response To Notices Of Violation"

The reference responded to Notices of Violation including one on disposal of cooling tower sediments. On page 3 of 9 of Appendix A of the reference we stated that we could not acknowledge or deny the violation without further review of the sediment sample data. We also committed to provide an amended response by July 30, 1993. This letter satisfies that commitment and provides clarification of corrective actions stated in the reference.

The Supply System denies this violation. An evaluation by J.S. Bland Associates, Inc. titled "Evaluation of the Sources of Radioactive Material Found In Cooling Tower Sediments At Washington Nuclear Plant 2" confirmed that the origin of radioactivity in the cooling tower sediments is not from WNP-2 licensed materials. The evaluation was based on sediment and river water sample results from 1985 to 1993. The evaluators concluded that the cooling tower sediment radioactivity results from concentration within the cooling towers of radioisotopes found on dissolved solids in the Columbia River water used for cooling tower makeup. These radioisotopes originate from upstream of WNP-2. Since the radioactivity in the cooling tower sediments did not originate from Supply System licensed materials, no violation of 10 CFR 20.301 occurred. The J.S. Bland Associates report on cooling tower sediments is available at WNP-2 for your review.

95-682-93-45

NRC INSPECTION REPORT 92-41 AMENDED RESPONSE TO NOV

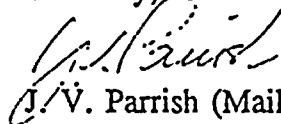
Related to this Notice of Violation, corrective action taken number 1 on page 4 of 9 of Appendix A of the reference requires amendment. Corrective action taken number 1 stated that "The cooling tower sediments will be handled and controlled without regard to the source of the radioactive material." In the future, upon verification through sampling that cooling tower sediments are not of WNP-2 licensed material origin, the sediments will be placed in the Supply System landfill or disposed of in an otherwise acceptable manner. This disposition of cooling tower sediments has been discussed in detail with the Washington State Department of Health. Records of this sampling and disposal will be maintained in accordance with the requirements of 10 CFR 50.75(g) for site decommissioning purposes. The sediments will not, however, be handled without regard to the source of origin. This was intended as an interim position pending receipt of the J.S. Bland evaluation results. The remaining stated corrective actions relative to this Notice of Violation regarding cooling tower sediment remain unchanged by this amendment.

Separately, corrective action taken number 5 on page 2 of 9 of Appendix A of the reference was inaccurately described. This inaccuracy was identified by an NRC Inspector. Corrective action taken number 5 stated "...the Shipping Coordinator has completed a comprehensive one week course on 49 CFR compliance, covering all aspects of these transportation regulations." This action should have read:

5. The WNP-2 Shipping Coordinator has successfully completed Waste Management Group's newly created RADMAN user certification program. In addition, the Shipping Coordinator has completed a course on 49 CFR compliance dealing with transportation regulations.

Finally, with regard to corrective action taken number 6 on page 7 of 9 of Appendix A of the reference, this action was also inaccurately described. This inaccuracy in the reference was also identified by the NRC Inspector. This corrective action stated that "Specific detailed training has been given to all Supply System employees with unescorted access into an RCA on the proper use of the RECs." Upon further review it was determined that informal training was conducted in the form of a "Health Physics Time Out" in June 1992. An Interoffice Memorandum (IOM) dated January 18, 1993 from the Plant Manager to "All Employees" addressed proper Radiation Exposure Card (REC) Usage. An IOM dated January 19, 1993 from the Plant Manager to "Distribution A, B, and C" (senior and middle management) discussed the importance of Radiation Protection Program adherence. The actions described above, and in particular the January 18, 1993 IOM, constituted the basis for corrective action taken number 6. Monitoring of the RECs by the Health Physics organization shows a significant downward trend of entry errors since the time of the violation.

Sincerely,



J.V. Parrish (Mail Drop 1023)

Assistant Managing Director, Operations

cc: BH Faulkenberry - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC

DL Williams - BPA/399
NRC Site Inspector - 901A

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9308090245 DOC. DATE: 93/07/30 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH: NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Amends 930426 response to violation noted in Insp Rept
 50-397/92-41 re disposal of cooling tower sediments. Util
 denies violation. Clarification of corrective actions stated
 in 930426 ltr listed.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT		COPIES		
	ID CODE/NAME		LTR	ENCL	
	PDV PD		1	1	
INTERNAL:	ACRS		2	2	
	AEOD/DSP/ROAB		1	1	
	AEOD/TTC		1	1	
	NRR/DORS/OEAB		1	1	
	NRR/DRIL/RPEB		1	1	
	NRR/PMAS/ILPB1		1	1	
	NUDOCS-ABSTRACT		1	1	
	OGC/HDS1		1	1	
	RES/HFB		1	1	
EXTERNAL:	EG&G/BRYCE, J.H.		1	1	
	NSIC		1	1	
	CLIFFORD, J		1	1	
	AEOD/DEIB		1	1	
	AEOD/DSP/TPAB		1	1	
	DEDRO		1	1	
	NRR/DRCH/HHFB		1	1	
	NRR/DRSS/PEPB		1	1	
	NRR/PMAS/ILPB2		1	1	
	OE DIR		1	1	
	REG FILE 02		1	1	
	RGN5 FILE 01		1	1	
	NRC PDR		1	1	

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 24 ENCL 24



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

July 30, 1993
GO2-93-198

Docket No. 50-397

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

Gentleman:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 92-41
AMENDED RESPONSE TO NOTICES OF VIOLATION

Reference: Letter GO2-93-096, dated April 26, 1993, JV Parrish (SS) to U. S. Nuclear Regulatory Commission "NRC Inspection Report 92-41 Response To Notices Of Violation"

The reference responded to Notices of Violation including one on disposal of cooling tower sediments. On page 3 of 9 of Appendix A of the reference we stated that we could not acknowledge or deny the violation without further review of the sediment sample data. We also committed to provide an amended response by July 30, 1993. This letter satisfies that commitment and provides clarification of corrective actions stated in the reference.

The Supply System denies this violation. An evaluation by J.S. Bland Associates, Inc. titled "Evaluation of the Sources of Radioactive Material Found In Cooling Tower Sediments At Washington Nuclear Plant 2" confirmed that the origin of radioactivity in the cooling tower sediments is not from WNP-2 licensed materials. The evaluation was based on sediment and river water sample results from 1985 to 1993. The evaluators concluded that the cooling tower sediment radioactivity results from concentration within the cooling towers of radioisotopes found on dissolved solids in the Columbia River water used for cooling tower makeup. These radioisotopes originate from upstream of WNP-2. Since the radioactivity in the cooling tower sediments did not originate from Supply System licensed materials, no violation of 10 CFR 20.301 occurred. The J.S. Bland Associates report on cooling tower sediments is available at WNP-2 for your review.

9308090245 930730
PDR ADDCK 05000397
G PDR



1001 1/0

NRC INSPECTION REPORT 92-41 AMENDED RESPONSE TO NOV

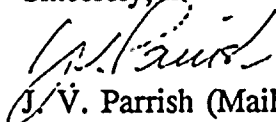
Related to this Notice of Violation, corrective action taken number 1 on page 4 of 9 of Appendix A of the reference requires amendment. Corrective action taken number 1 stated that "The cooling tower sediments will be handled and controlled without regard to the source of the radioactive material." In the future, upon verification through sampling that cooling tower sediments are not of WNP-2 licensed material origin, the sediments will be placed in the Supply System landfill or disposed of in an otherwise acceptable manner. This disposition of cooling tower sediments has been discussed in detail with the Washington State Department of Health. Records of this sampling and disposal will be maintained in accordance with the requirements of 10 CFR 50.75(g) for site decommissioning purposes. The sediments will not, however, be handled without regard to the source of origin. This was intended as an interim position pending receipt of the J.S. Bland evaluation results. The remaining stated corrective actions relative to this Notice of Violation regarding cooling tower sediment remain unchanged by this amendment.

Separately, corrective action taken number 5 on page 2 of 9 of Appendix A of the reference was inaccurately described. This inaccuracy was identified by an NRC Inspector. Corrective action taken number 5 stated "...the Shipping Coordinator has completed a comprehensive one week course on 49 CFR compliance, covering all aspects of these transportation regulations." This action should have read:

5. The WNP-2 Shipping Coordinator has successfully completed Waste Management Group's newly created RADMAN user certification program. In addition, the Shipping Coordinator has completed a course on 49 CFR compliance dealing with transportation regulations.

Finally, with regard to corrective action taken number 6 on page 7 of 9 of Appendix A of the reference, this action was also inaccurately described. This inaccuracy in the reference was also identified by the NRC Inspector. This corrective action stated that "Specific detailed training has been given to all Supply System employees with unescorted access into an RCA on the proper use of the RECs." Upon further review it was determined that informal training was conducted in the form of a "Health Physics Time Out" in June 1992. An Interoffice Memorandum (IOM) dated January 18, 1993 from the Plant Manager to "All Employees" addressed proper Radiation Exposure Card (REC) Usage. An IOM dated January 19, 1993 from the Plant Manager to "Distribution A, B, and C" (senior and middle management) discussed the importance of Radiation Protection Program adherence. The actions described above, and in particular the January 18, 1993 IOM, constituted the basis for corrective action taken number 6. Monitoring of the RECs by the Health Physics organization shows a significant downward trend of entry errors since the time of the violation.

Sincerely,



J.V. Parrish (Mail Drop 1023)

Assistant Managing Director, Operations

cc: BH Faulkenberry - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC

DL Williams - BPA/399
NRC Site Inspector - 901A