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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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REGION V

September 13, 1993
G02-93-232

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 93-25
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 13, 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: 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 during the weeks of July 12 through July 23, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is identified below:

- A. 10 CFR part 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings..."

WNP-2 Administrative Procedure 1.2.3, Revision 20, "Use of Controlled Plant Procedures," requires in Paragraph 5.1.1 that, "STRICT ADHERENCE to procedures is our standard to operate and maintain the plant safely and efficiently," and requires in Paragraph 5.1.8 that, "Plant personnel are responsible for ensuring the administrative details associated with procedure performance are completed. For example: completing all paperwork, ensuring all signatures are obtained...."

WNP-2 Administrative Procedure 1.4.1, Revision 14, "Plant Modifications," Paragraph 5.4, Step 1 requires that the assigned project engineer, "initiate and coordinate the preparation of the PMR [Plant Modification Record] Package Checklist." The PMR Package Checklist includes a block to check whether Scheduled Maintenance System (SMS) Data Input Sheets are required.

WNP-2 Administrative Procedure 1.4.1, Paragraph 5.5, Step 20 requires that the assigned project engineer, "Assure the SMS Data Input Sheets required by PPM [Plant Procedures Manual] 10.1.5 are completed. Sign the PMR [Plant Modification Record] Package Checklist...."

Contrary to the above, as of July 13, 1993, the PMR Package Checklists for Basic Design Changes (BDCs) 88-0442-0A, 93-0024-0A and 91-0222-0A were checked that SMS Data Input Sheets were required but contained no signature for assuring that SMS Data Input Sheets were completed and no SMS Data Input Sheets had been completed. These BDCs were installed and design implementation verified to be completed.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The three examples cited involved a failure to include in the Scheduled Maintenance System (SMS) preventive maintenance tasks for new equipment installed as part of Basic Design Changes (BDCs) and implemented through the Plant Modification Record (PMR) process. These three occurrences, BDCs 88-0442-0A, 93-0024-0A and 91-0222-0A, were as stated by the Inspectors in Inspection Report 93-25.

BDC 88-0442-0A provided replacement of DSA-PCV-1C and 2C. A test procedure was written to test these valves after installation. The intent was to use the test procedure as the basis for development of a periodic test for the valves. However, since no SMS Data Input Sheets were submitted for the valves, the need for the new procedure was not documented or well understood.

The project engineers assigned to the three PMR packages did not initiate SMS Data Input Sheets as part of the package close-out process as required by PPM 1.4.1. These omissions were not identified during the package closeout process. PPM 1.4.1 had a step requiring initiation of the SMS Data Input sheets and called for a signoff on the PMR Package Checklist. However, the PMR Package Checklist did not contain a signoff block for this step.

The root cause for this violation was less than adequate work practices/other intended verification not made in that three project engineers did not ensure the SMS Data Input Sheets were initiated as required by the procedure, and the reviewers did not identify the lack of SMS input during PMR close-out. A contributing cause for this event was a less than adequate procedure in that PPM 1.4.1 requires the project engineer to sign the PMR Package Checklist for completion of SMS Data Input Sheets but does not provide a place for this signature on the PMR Package Checklist.

Corrective Steps Taken/Results Achieved

1. PPM 1.4.1, Plant Modifications, was changed on August 30, 1993 to include an SMS Checklist with a sign-off to ensure the SMS Data Input Sheets have been submitted.
2. An Interoffice Memorandum was issued on July 22, 1993 to identify the new SMS Checklist and to direct the Technical Services System Engineers and Project Management Project Engineers to use the new form, in addition to the form in PPM 1.4.1, from that point on.
3. SMS Data Input Sheets were submitted for DSA-PCV-1C and 2C, E-RLY-62/B/7/1, E-RLY-62/B/8/1, and DG-RLY-DG2/VR1A and VR2A.

4. The Plant Technical Services Division has provided technical input to the Maintenance Division regarding the maintenance requirements for DSA-PCV-1C and 2C to support development of a test procedure.
5. The three project engineers for the PMRs cited in the violation were counseled on the need to ensure SMS Data Input Sheets are completed when required.
6. This Notice of Violation and the associated back-up information was distributed to members of the Plant Technical and WNP-2 Projects groups to make them aware of this violation in an effort to preclude problem recurrence.

Corrective Action to be Taken

The Plant Maintenance Division will write a test procedure, or include the appropriate information in an existing test procedure, to test valves DSA-PCV-1C and 2C as required by the SMS. This test procedure will be approved by April 10, 1994 to support testing during the next maintenance and refueling outage.

Date of Full Compliance

The Supply System was in full compliance with the requirements of procedure PPM 1.4.1 on September 10, 1993.

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

SUBJECT: Responds to NRC 930813 ltr re violations noted in insp rept
 50-397/93-25. Corrective actions: changed plant mod PPM 1.4.1
 & issued memo to identify new scheduled maint sys checklist.

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