



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 963 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

November 29, 1993
G02-93-277

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 93-40
RESPONSE TO NOTICE OF VIOLATION

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The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated October 29, 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

REF/bk

Attachments

cc: BH Faulkenberry - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRR
DL Williams - BPA/399
NRC Site Inspector - 927N

93-2090123

Appendix A

During an NRC inspection conducted during the period of September 27 through October 1, 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. 10 CFR Part 50, Appendix R, Section III.I.3.d, states:

At 3-year intervals, a randomly selected unannounced drill must be critiqued by qualified individuals independent of the licensee's staff. A copy of the written report from these individuals must be available for NRC review and shall be retained as a record as specified in section III.I.4 of this appendix.

Section 6.6.4.e of Washington Public Power Supply System Nuclear Operation Standard, NOS-39, "Fire Protection Program," Revision 5, dated August 16, 1993, states:

Triennially an unannounced drill shall be critiqued by qualified persons independent of the Supply System.

Contrary to the above, as of September 30, 1993, the licensee had no record of an unannounced drill which was critiqued by qualified persons independent of the Supply System in the past three years.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The root cause for this event is failure to comply with procedural requirements. In accordance with NOS-39 the Managers of Operations and Health, Safety and Fire Protection are responsible for the performance of fire drills including an unannounced drill critiqued by an independent evaluator every three years. Similar criteria identified in Generic Letter 82-21, "Technical Specifications for Fire Protection Audits," led to the incorporation of a randomly selected unannounced fire drill critiqued by an independent evaluator into QA's 1985 Triennial Fire Protection Audit. This resulted in a misinterpretation that QA had accepted responsibility for the performance of future randomly selected unannounced drills critiqued by an independent evaluator. A drill meeting these requirements had not been planned and performed since the 1985 QA Triennial Fire Protection Audit.

The primary contributing cause is Inadequate Interface Among Organizations. The organization with the ultimate responsibility for performing fire drills was not clearly defined in NOS-39 and the implementing procedure PPM 1.3.10, "Fire Protection Program." Both the Operations Department and the Health, Safety and Fire Protection Department were assigned responsibility for the performance of fire drills.

Corrective Steps Taken/Results Achieved

1. Appropriate personnel in both the Operations and Health, Safety and Fire Protection departments have been counselled on procedure compliance.
2. An unannounced drill was observed by a qualified individual independent of the licensee's staff on October 20, 1993.
3. A Scheduled Maintenance System (SMS) task was put in the SMS system to provide notification of the required drill.
4. Plant Procedure, PPM 1.3.10, "Fire Protection Program Implementation," was changed to clearly reflect the requirement for the drill.
5. Nuclear Operation Standard, NOS-39, was changed to clarify responsibilities to obtain the independent audit.
6. PPM 1.3.10 was changed to require HSFP to be responsible for conducting the independently critiqued three year randomly selected unannounced drill.
7. Other NOS fire drill requirements have been reviewed to assure proper interfaces and responsibilities are identified.

Corrective Action to be Taken

No further actions were identified.

Date of Full Compliance

The Supply System was in full compliance on October 20, 1993, when the randomly selected unannounced drill was witnessed by an independent evaluator.



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 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
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 50-397/93-40 on 930927-1001. Corrective actions: counseled
 personnel on procedure compliance.

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