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ACCESSION NBR: 9312220007 DOC. DATE: 93/12/10 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
 Ofc of Enforcement (Post 870413)

SUBJECT: Responds to violations noted in insp repts 50-397/93-18,
 50-397/93-24 & 50-397/93-29. Corrective actions: monitoring &
 feedback mechanism enhanced by incorporating problem
 classification sys.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

December 10, 1993
G02-93-289

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Director, Office of Enforcement
Mail Station 7 H5
Washington, D. C. 20555

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
 NRC INSPECTION REPORTS 93-18, 93-24, and 93-29
 RESPONSE TO NOTICES OF VIOLATION

Reference: 1) Letter G02-93-228, dated September 8, 1993, JV Parrish (SS) to NRC, ,
 "NRC Inspection Reports 93-18 and 93-24 Reply To Apparent Violations"

 2) Letter G02-93-263, dated November 1, 1993, JV Parrish (SS) to NRC, ,
 "Resolution of Residual Heat Removal (RHR) Potential Water Hammer
 Issue"

The Washington Public Power Supply system hereby replies to the Notices of Violation contained in your letter dated November 10, 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). Appendix A contains an explanation of our position regarding the validity of the violations, the root causes, corrective actions taken and planned, and the dates of full compliance.

The four cited violations represent instances of procedural non-compliance. The Supply System clearly recognizes that procedural compliance is one of the most important issues requiring significant attention in the near term. We recognize further that, unless we succeed in alleviating this problem, a major obstacle will remain in our path toward continued improvement of the operations at WNP-2.

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**NRC INSPECTION REPORTS 93-18, 93-24, and 93-29
RESPONSE TO NOTICES OF VIOLATION**

In this context, we discussed with you at the enforcement conference the root causes of our past procedural compliance problems. Our understanding of these causes derives from both NRC and Supply System evaluations. As we previously stated, the problems fell into the following areas:

- failure to commit to standards of performance and enforcement;
- failure to adequately communicate management expectations;
- lack of personal ownership;
- inadequate communication between personnel and supervisors;
- weaknesses in corrective actions response; and
- need for greater management oversight.

Based on a thorough evaluation of the past procedural compliance problems and those cited in the current NOV, there are three areas in need of improvement. The first is to utilize a more structured approach to monitoring procedural compliance. In this regard, we identified at the enforcement conference four elements of a healthy procedure compliance process at WNP-2: (1) establishment, communication and internalization of management expectations; (2) adequate procedures; (3) proper training; and (4) effective corrective actions. Effective monitoring of these process elements will help assure a high standard of performance.

The Supply System recently enhanced our monitoring and feedback mechanisms by incorporating a problem classification system that more clearly measures procedure compliance errors. The system differentiates between significant and non-significant errors based on the consequences or potential consequences. It also distinguishes between organizations and work groups. The errors are characterized as a rate normalized to the amount of work in progress at the time, and therefore, adjusts for changes in work activity (e.g., refueling outages) to accurately assess long term trends.

The enhanced monitoring has already validated an area where we need to improve. A previously introduced self-checking initiative assisted a maintenance shop in minimizing procedure compliance problems. Recently, the trend system validated an increasing procedure compliance error rate in that shop. The shop supervisor was notified of the increasing trend. The supervisor is reinforcing the principle of self-checking in meetings and shop business. We fully expect that this type of monitoring and trending will lead to similar feedback and enhanced performance in other areas.

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The second and third areas of improvement involve enhancing the self-checking process and improving the questioning attitude of personnel. Both of these areas relate directly to management expectations, which is perhaps the most important element of our procedural compliance process. To be effective, of course, Supply System management expectations must be adequately communicated to all personnel and must be completely internalized by them.

As we reported during the enforcement conference, all indications are that management's expectation of strict adherence to procedures has been appropriately communicated to all employees. However, as we also reported, all employees have not fully embraced their responsibility to consistently follow the management expectation. The Supply System acknowledges that the cited violations substantiate that our efforts in this regard have not been totally effective. In particular, the suppression pool cooling (SPC) matter represents a clear instance where management expectations were not met.

Improving the self-checking process and employees' questioning attitude, however, will not be an easy task. These matters involve changing the very culture of the Supply System. Nevertheless, we believe a lasting change will be achieved in the attitude of our personnel. In fact, we believe improvements are already being seen as a result of the actions we have taken to date. These actions have been described to you in our SALP response, in numerous management meetings we have had with your staff including the recent enforcement conference and the senior management meeting held on December 8, 1993 at WNP-2, and in applicable LERs and NOV responses.

Following the submittal (Reference 1) of our responses to the apparent violations in Inspection Reports 93-18 and 93-24, we discussed the responses with the NRC Staff. Specific concerns were identified regarding management oversight of the issues. Several instances were cited where management had been aware that problems existed but had not, with a questioning attitude, intrusively ensured that the problems were resolved. The Supply System acknowledges that all employees, supervisors, and managers must continually exhibit a questioning attitude in their daily activities. Actions taken to foster a more questioning attitude include: (1) procedural compliance meetings with Plant supervision emphasizing the need to look for deficiencies and raise identified issues with senior management; (2) quarterly performance reviews for selected managers and supervisors include a section on procedural adherence; (3) a human performance monitoring program is being initiated to monitor the effectiveness of applicable corrective actions, and (4) quarterly evaluations of Supply System personnel have been implemented to monitor and provide feedback on personnel performance.

The Supply System is not satisfied with our past failures nor our current state of progress on the matter of procedural compliance. We fully intend to devote further attention to this matter.

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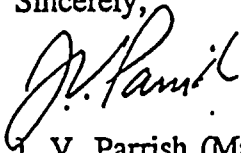
On another issue regarding LER 93-01, the Supply System does not agree that the corrective actions described in the LER were "not aggressive." We documented our position on this issue in Reference 2. As the letter discusses, we believe that the corrective actions, such as declaring the residual heat removal (RHR) system inoperable while in the SPC mode, are conservative.

Reference 2 discusses the basis for our position -- principally that operation of the RHR system in SPC mode is not considered to be within the WNP-2 design basis of a loss of off-site power (LOOP) or failure to fast transfer coincident with a loss of coolant accident (LOCA). The November 10, 1993 NOV did not acknowledge our position on this matter. Our view continues to be that specific corrective actions related to potential water hammer resulting from a LOOP or failure to fast transfer coincident with a LOCA are not required under the regulations. The situation, however, raises generic concerns which we believe should be promptly addressed by the NRC.

However, the Supply System believes that corrective actions to reduce the potential for water hammer are desirable. Thus, to further reduce the probability of such an event, the Supply System has initiated corrective actions to minimize operation of SPC. Operation of SPC is limited to an annual average of 15 hours per week. Since July of 1993, SPC has operated an average of approximately five hours per week. From December 1992 to April 1993, SPC was operated an average of approximately 12 hours per week.

In sum, the Supply System wishes to reemphasize its strong commitment to improving our performance in the area of procedural compliance. As described in more detail in Appendix A, we have been and are taking actions to enhance our performance in the near- and long-term. These actions will help us assure that procedural non-compliance such as the SPC matter do not occur in the future. We reiterate in this regard that the SPC matter represents a clear instance where management expectations were not met. Future instances of this type of procedural non-compliance will not be tolerated. Moreover, where appropriate, we plan to utilize disciplinary action to assist in minimizing the recurrence of procedural non-compliances.

Sincerely,



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

Attachments

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



Appendix A

During NRC inspections conducted on May 3 through August 2, 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 Nuclear Regulatory Commission proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violations and associated civil penalty are set forth below:

I. Violation Assessed a Civil Penalty

Section 6.8.1 of the Technical Specifications states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Section 4.e recommends procedures for operation of the Shutdown Cooling System.

WNP-2 Operating Procedure PPM 2.4.2, "Residual Heat Removal," Revision 16 (applicable from October 8, 1990, to June 17, 1992), stated in Paragraph 5.22 under the heading "Limitations:" "During non-emergency conditions, do not align more than one RHR [Residual Heat Removal] loop in the suppression pool cooling mode at a time."

PPM 2.4.2, Revision 17 (applicable from June 18, 1992, to November 1, 1992), stated in Paragraph 4.23 under the heading "Precautions and Limitations:" "During non-emergency conditions, do not align more than one RHR loop in the Suppression Pool Cooling mode at one time."

Contrary to the above, on September 30, 1991, and on July 6 and 11, 1992, during non-emergency conditions, operators place two loops of RHR in the Suppression Pool Cooling Mode.

This is a Severity Level III violation (Supplement I).
Civil Penalty - \$75,000. (01013)

Validity of Violation

The Supply System acknowledges the validity of the violation. The root causes of the violation were: (1) that the Shift Manager involved was not aware of the relevant caution statement for the September 1991 event; and (2) that the same Shift Manager failed to adequately review the precautions/limitations associated with the relevant caution statement for the two July 1992 events. As discussed in more detail below, there were several other factors that also contributed to the violation.



During the enforcement conference, the Shift Manager pointed out that the decision to enter two loop operation was principally based on his understanding of the system function and the prevailing practice regarding the use of cautions. Specifically, the Shift Manager understood the water hammer effects to be related to the valves repositioning automatically from the SPC lineup to the LPCI lineup. This transient could result in minor water hammers due to the redirection of the system flow. Although Supply System operators had received general training on water hammer events, the particular scenario of SPC operation with a LOOP coincident with a LOCA had not been addressed.

Concerning the prevailing practice regarding the use of cautions, the Shift Manager believed that he had discretion under the existing procedures regarding whether to follow procedural cautions. Until March of 1993, PPM 1.3.1, Conduct of Operations, step 5.12.2.3.f stated: "Cautions are provided to alert the operator of a potential hazard and its consequence relative to procedural actions or equipment operation. They allow the operator to properly evaluate the risks associated with the proposed action. Therefore, cautions are not inviolate." Thus, based on his understanding of this procedure language, the Shift Manager felt that his actions were appropriate and within his prerogative. The Shift Manager believed it to be prudent to avoid containment challenges by maintaining the Suppression Pool as cool as possible.

Closer scrutiny of the existing relevant procedures indicates that the Shift Manager's decision to operate both loops was flawed. First, the procedural (PPM 2.4.2, Revision 16) caution, in place at the time of the September 1991 event, stated: "Do not operate more than one RHR loop in the suppression pool cooling mode at a time during non-emergency conditions. The affected loop may be rendered inoperable due to void induced water hammer during a LOCA." This caution was revised prior to the July 1992 events to read: "Operating more than one loop in the Suppression Pool Cooling mode at a time during non-emergency conditions may render the affected loops inoperable due to a void induced water hammer following a LOCA." (PPM 2.4.2, Revision 17).

In addition to the caution statements, the precautions and limitations section of PPM 2.4.2., step 5.22 stated: "During non-emergency conditions, do not align more than one RHR loop in the suppression pool cooling mode at a time. A design basis LOCA coincident with a Loss of Offsite Power that occurs when one or more RHR loops are in suppression pool cooling will void portions of the effected RHR loops when the diesel generators restart the RHR pumps." Furthermore, it was noted in both PPM 1.2.3 Use of Controlled Plant Procedures and PPM 1.3.1 that precautions and limitations should be reviewed prior to performing the procedure.



Based on the above, and in spite of the apparent discretion provided by PPM 1.3.1, sufficient information was provided to explain the consequences of operating two loops of RHR, if the precautions and limitations were reviewed in conjunction with the caution statements.

However, as our investigations showed, the caution statement that was in effect during the September 1991 event was not reviewed by the Shift Manager nor was it brought to his attention by personnel performing the activity. Further, during the 1992 events, the Shift Manager did not review the precautions and limitations section of PPM 2.4.2. Consequently, he based his decision in these instances solely on the caution statement.

Recent interviews with the operators involved in these events and other operations personnel revealed that under existing practices and attitudes, actions taken during these events would be a clear violation of the procedures. Also, after a subsequent review of all information available at the time of the events, the involved Shift Manager determined that placing two loops of RHR into Suppression Pool Cooling at the same time was not appropriate.

Corrective Steps Taken/Results Achieved

1. PPM 1.2.2, Plant Procedure Preparation, and PPM 1.2.3, Use of Controlled Plant Procedures, were changed to require that a specific "do not" phrase in a caution statement is inviolate.
2. PPM 2.4.2, RHR, was changed to add "do not" to a caution statement referring to operation of two loops of SPC at the same time.
3. PPM 1.3.1, Conduct of Operations, was changed to remove any instructions on caution and precaution statements and more appropriately references PPM 1.2.3.
4. The operators involved in the incident have been counselled on procedure compliance.
5. LER 93-001-01 and the September 22, 1993 Enforcement Conference has been discussed with the operating crews by the Shift Manager involved in the 1991 and 1992 two loop operation of SPC.
6. The control room operating crews have been trained regarding mandatory procedure compliance. The training emphasized that unauthorized departure from a plant procedure is forbidden. If difficulties are encountered while performing the procedure, it is management's expectation that the procedure should be suspended, the plant placed in a safe condition, and the conditions evaluated and appropriately resolved.



7. The Supply System contracted with an outside consultant to perform a common cause analysis of procedure non-compliance at WNP-2. Initially, through personnel interviews and evaluation of past events, the consultant has concluded that problems contributing to the procedure adherence problems are:

"Excessive Program Implementation Requirements"
"Inadequate Self-Verification Process"
"Inadequate Job Skills, Work Practices, and Decision Making"
8. Management expectations of strict adherence to procedures has been communicated to Supply System employees (e.g., through a series of shop training sessions, management letters to Supply System employees).

Corrective Actions to be Taken

1. The Assistant Managing Director for Operations will evaluate the consultant's recommended specific corrective actions to minimize procedural non-compliance and establish a plan to implement appropriate corrective actions by February 18, 1994.
2. A sample population (65) of Operations procedures was reviewed and deficient procedures revised as necessary to assure consistency between the caution statements and precautions. A substantial number of inconsistencies were identified. A program to review appropriate plant procedures to assure consistency between caution statements and precautions and also, to assure accordance with the requirements of PPM 1.2.2 will be completed by December 31, 1995.

Date of Full Compliance

WNP-2 was in full compliance when PPM 2.4.2 was changed on March 18, 1993 to enter the Technical Specification LCO when a given train of RHR is lined up to SPC.

II. Violations Not Assessed A Civil Penalty

- A. Section 6.8.1 of the Technical Specifications states, in part:

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

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- c. Refueling operations. ...
- g. Fire Protection Program implementation."



Appendix A of Regulatory Guide 1.33 recommends the following procedures:

- Section 1.c recommends a procedure for equipment control (e.g., locking and tagging).
 - Section 8.a recommends a procedure to ensure that tools, gauges, instruments, and other measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.
 - Section 8.b.(2)(a) recommends a procedure for containment and penetration leak-rate tests.
1. WNP-2 refueling procedure PPM 6.3.2, "Fuel Shuffling and/or Offloading and Reloading", Revision 7, required:
- In Step 6.1, that the Refueling Floor Operator perform the steps, in order, listed on the Nuclear Component Transfer List.
 - In Attachment 8.4, "Bridge Manipulations During Refueling," that control rod blade guides be oriented with spacer buttons facing the control rod blades.
 - In Step 6.1.3, that the Refueling Floor Operator verify the identify of each fuel assembly by orientations and location on the Nuclear Components Transfer List as it is loaded.

Contrary to the above:

- a. On May 9, 1993, the Refueling Floor Operator did not perform the steps, in order, listed on the Nuclear Component Transfer List, in that Step 250 was performed before Step 249.
- b. As of May 12, 1993, during refueling, several blade guides were not oriented with spacer buttons facing the control rod blades.
- c. As of May 12, 1993, the orientation of a fuel bundle had not been properly verified as it was loaded in that it was found misoriented 90 degrees.
- d. As of May 23, 1993, the orientation of a fuel bundle had not been properly verified as it was loaded in that it was found misoriented 180 degrees.

2. WNP-2 Administrative Procedure PPM 1.3.10, Revision 12, "Fire Protection Program," in Section 6.1, "Fire Protection System Impairments," states:

"6.1.1.c. Examples of PLANNED impairments include ... Propping a normally closed fire door in the open position.

6.1.1.d A fire protection system impairment permit is not required ... provided ALL of the following conditions can be met:... The impaired component must be attended (within line of sight).

6.1.2.c Impairments involving passive fire protection components (i.e., fire doors, dampers and penetrations): ... Must be documented by use of a Fire Impairment Checklist, unless the requirements of 6.1.1.d are met."

Section 6.3.5.a states:

"... Combustible liquids must be removed and put into storage at the end of the job or at the end of the shift if the job is not continuous between consecutive shifts."

Section 6.3.8.a states in part:

"... When removal is not possible, a Transient Combustible Permit is required if the combustibles are to be left unattended for any length of time (i.e., breaks, lunch)"

Contrary to the above:

- a. On May 27, 1993, the fire door to the Division 1 battery charger room was propped open. The impairment was unattended, as no licensee personnel were present at the door or within line of sight, and this impairment was not documented by a Fire Impairment Checklist.
- b. On July 19, 1993, combustible liquids were present in the Residual Heat Removal A pump room, having been left unattended since July 17, 1993, but no Transient Combustible Permit had been obtained.

3. WNP-2 Administrative Procedure PPM 1.3.29, Revision 18, "Locked Valve Checklist," states in section 4.1, "All locked valves greater than or equal to 2 inches shall be fixed in place using a shackle lock and chain."

Contrary to the above, on June 1, 1993, valves RRC-V-51A and RRC-V-51B (2-inch valves) were required by PPM 1.3.29 to be locked closed, but were not fixed in place by a lock and chain in that the handwheels secured by the locking device were not attached to the valves.

4. WNP-2 Administrative Procedure PPM 1.5.4, Revision 16, "Control of Measuring and Test Equipment - Transfer Standards," Step 6.1.5.a, requires that personnel using measuring and test equipment (M&TE) ensure that each piece of M&TE is properly checked out from the M&TE Tool Crib.

Contrary to the above, on May 8, 1993, personnel used an M&TE gauge to perform a pressure test of Diesel Generator No. 2, engine B, cylinder 20, in accordance with Maintenance Work Request AP-1184, Step 2.40, which had not been checked out from the M&TE Tool Crib.

5. WNP-2 Surveillance Test Procedure PPM 7.4.6.1.2.4, Revision 7, "Containment Isolation Valve and Penetration Leak Test Program," Step 2.1.6, states the following:

"Containment penetration components undergoing maintenance/repairs which could alter the leakage rate shall require...as-found...testing during the outage period in which the maintenance is performed, unless determined not required by the LLRT [local-leak rate test] test coordinator."

Contrary to the above, on May 3, 1993, containment penetration valves RHR-V-16B and RHR-V-17B underwent maintenance activities which could have altered the leakage rate and no as-found testing was performed nor determination made by the LLRT coordinator that the test was not required.

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

Validity of Violation

The Supply System acknowledges the validity of the violation. The root cause of the events for Items II.A.1, .2, .3, and .5 above are as described in the September 8 response¹. Unless otherwise indicated below, the corrective actions taken and to be taken are the same as described in the September 8 response.

For Item II.A.4 above, the root cause is personnel work practices in that personnel did not follow procedures. Per the discussion in the September 8 response for Apparent Violation 93-18-12, personnel believed that Section 4.4 of PPM 1.5.4 allowed them to use equipment not checked out from the M&TE tool crib. Based on this rationale, they did not consider Step 6.1.5.a of PPM 1.5.4 applicable. However, as written, the step was applicable, and should have been followed or the procedure appropriately changed.

Corrective Steps Taken/Results Achieved

1. PPM 1.3.10 was revised as indicated in the September 8 response.
2. Operations personnel have been cautioned to question any valve that cannot be signed off exactly as the valve checklists indicate.
3. Appropriate M&TE personnel have been trained on the procedural requirements and provisions of PPM 1.5.4.
4. PPM 1.5.4 was revised to remove the requirement to label noncalibrated test equipment as "Non Data" since calibrated test equipment must be labeled as such.

Corrective Action to be Taken

Appropriate maintenance personnel will be trained by December 17, 1993 to emphasize the requirement for properly checking out M&TE equipment.

Date of Full Compliance

WNP-2 was in full compliance when the combustible liquids were removed from the RHR A pump room on July 19, 1993.

¹ Letter, JV Parrish (SS) to NRC, G02-93-228, "NRC Inspection Reports 93-18 and 93-24 Reply To Apparent Violations", dated September 8, 1993.



- B. Section 6.8.1.k of the Technical Specifications states that written procedures shall be established, implemented and maintained covering Health Physics/Chemistry Support.

Section 6.12.1 of the Technical Specifications states in part that "each high radiation area in which the intensity of radiation is greater than 100 mrems/h but less than 1000 mrems/h shall be barricaded and conspicuously posted as a high radiation area."

Section 3.1.7.4.1 of the WNP-2 Health Physics Program Description (HPPD), Revision 34, states, "An area shall be posted as a radiation area where there exists radiation at such levels that a major portion of the body could receive in any one hour a dose of 2.5 millirem."

WNP-2 Administrative Procedure PPM 1.11.11, Revision 2, "Entry Into, Conduct In and Exit from Radiologically Controlled Areas," Paragraph 4.6, states that "Persons entering a radiologically controlled area shall return barriers, altered for access, to their original position after passing."

Contrary to the above,

1. On May 28, 1993, an area on the 522-foot elevation of the reactor building contained radiation levels greater than 100 mrem/hour, but was not conspicuously posted at all entrances to the area as a "High Radiation Area." Specifically, an 18-inch gap behind the instrument rack on the 522-foot elevation provided access to the High Radiation Area, but was not posted.
2. On May 19, 1993, in an area of the 548-foot elevation of the reactor building where a major portion of the body could receive in any one hour a dose of 2.5 millirem, radiation levels were greater than 5 mrem/hour, but the area was not conspicuously posted as a radiation area.
3. On May 27, 1993, personnel who entered a radiation area at the entrance to the offgas preheater room on the 441-foot elevation of the turbine building altered a barrier for access to a radiologically controlled area, but they did not return the barrier to its original position when exiting.

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

Validity of Violation

The Supply System acknowledges the validity of the violation. Unless otherwise indicated below, the root cause of the event, and the corrective actions taken and to be taken as described in the September 8 Response² remain unchanged.

² Id.



Corrective Steps Taken/Results Achieved

1. A Health Physics "Time Out" was held to discuss plant personnel responsibilities in maintaining sign/barrier postings.

Corrective Action to be Taken

No further actions were identified.

Date of Full Compliance

WNP-2 was in full compliance when the subject radiation areas were properly posted and the down barriers were appropriately restored.

- C. 10 CFR Part 50, Appendix B, Criterion V, requires activities affecting quality to be prescribed by appropriate procedures and accomplished in accordance with those procedures.

1. WNP-2 Administrative Procedure PPM 1.3.9, "Temporary Modifications," states in Paragraph 6.3, "Restoration of a TM [temporary modification] via TMR,"

"6.3.6 Upon authorization from the Shift Manager, the Work Supervisor, or designee shall:...

- c. Account for all TMR tags. Return all the TMR tags to the Control Room. Tags that cannot be returned because they are lost or contaminated shall be noted in the TMR form COMMENTS section.
- d. Ensure the individuals performing the removal sign the Restoration Performed by and Verified by steps on the original TMR form.
- e. Inform the Shift Manager... the TM restoration is complete..."

"6.3.7 The Shift Manager shall:

- a. Review the original TMR form to ensure all the TMR tags are accounted for, returned tags are discarded, and all the required steps are signed....
- c. Ensure any restoration testing specified on the TMR is completed.
- d. Ensure documents changed and/or special instructions issued...are corrected and operating personnel on his shift have been briefed.

- e. Sign the Restoration Complete and note any unexpected, or unusual events in the Comments section...
- f. File the TMR in the Completed section of the TMR log.
- g. Make the appropriate date entry in the TMR Log Index under Restored Date."

Contrary to the above, on June 20, 1993, the hardware associated with temporary modification required TMR-93-017 was removed but the TMR tags were not returned to the control room or accounted for; the signatures for restoration by the craft or Shift Manager were not obtained; the Shift manager was not notified; Operations personnel were not briefed on the restoration; the TMR log index was not updated; and TMR-93-017 was left in the Active section of the TMR log.

- 2. WNP-2 Administrative Procedure PPM 1.17.2, Revision 1, "Procurement Engineering Reviews," required in Paragraph 7.4 that substitute items that are not identical to the original item have substitution evaluations performed to determine their suitability for use in safety-related applications.

Contrary to the above, as of June 9, 1993, the licensee had replaced safety-related carbon steel hydraulic control unit accumulators with new stainless steel accumulators of a different size, weight, and pressure and temperature rating without performing a substitution evaluation to ensure the suitability of the new design.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. Unless otherwise indicated below, the root cause of the event, and the corrective actions taken and to be taken remain unchanged as described in the September 8 Response³.

Corrective Steps Taken/Results Achieved

Maintenance and Operations personnel having responsibility to implement procedures associated with TMR 93-017 were counseled on lessons learned from this event.

Corrective Action to be Taken

An evaluation was performed to determine how the ownership of a TMR can be improved. PPM 1.3.9 will be changed by February 28, 1994 to clarify responsibilities and expectations.

³ Id.



Date of Full Compliance

WNP-2 was in full compliance when the TMR tags were returned to the Control Room and dispositioned in accordance with PPM 1.3.9 on July 1, 1993.