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SUBJECT: Responds to NRC 931223 ltr re violations noted in insp rept
 50-397/93-44. Corrective actions: on 931117, emergency
 preparedness personnel verified that second & fourth
 quarter 1993 TSC inventory checksheets completed.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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January 24, 1994

G02-94-019

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D. C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21**
 NRC INSPECTION REPORT 93-44
 RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated December 23, 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. The Supply System shares your concern that this problem involves the Support Services Tracking System, which has been identified as a concern in previous audits and inspections. Appendix A addresses the conversion of the Support Services Tracking System to the Passport computer program.

Sincerely,

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

KBL/bk

Attachments

cc: KE Perkins - NRC RV
 NS Reynolds - Winston & Strawn
 JW Clifford - NRR

DL Williams - BPA/399
NRC Site Inspector - 927N

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Appendix A

During an NRC inspection conducted at the Washington Nuclear Project — Unit 2 (WNP-2) on November 15 through 19, 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 cited violation is listed below:

1. 10 CFR 50.54(q) requires a licensee to follow and maintain in effect emergency plans which meet the standards of 10 CFR 50.47(b) and Appendix E to this part.

Section 10.5 of the Washington Nuclear Project — Unit 2 (WNP-2) approved Emergency Plan provides that an inspection, inventory, and operational check of emergency equipment/instruments in each emergency cabinet or kit is conducted at least quarterly and after each drill which utilized that particular cabinet and kit.

WNP-2 Technical Specification 6.8 requires that written procedures shall be established, implemented and maintained covering Emergency Plan Implementation.

WNP-2 Emergency Plan Implementing Procedure 13.14.4 requires that completed record forms of Technical Support Center inspection, inventory, and operational checks be forwarded to the Manager, Emergency Planning.

WNP-2 Technical Specification 6.10.2.d requires that records of surveillance activities, inspections, and calibrations required by Technical Specifications be retained for at least 5 years.

Contrary to the above, on November 17, 1993, the WNP-2 Emergency Preparedness Staff had no record form or other documentation of an inspection, inventory and operational check of emergency equipment/instruments in each emergency cabinet or kit in the Technical Support Center (TSC) for the 3rd Quarter of 1993.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The root cause of not being able to retrieve the third-quarter Technical Support Center (TSC) inspection/inventory checksheet for 1993 was a failure to follow procedures. A contributing cause of this failure was an inadequate tracking process used and maintained by the Emergency Planning organization. This tracking process is formally termed the Support Services Tracking System (SSTS). The SSTS database and its host procedure Support Services Instruction SSI 9.2.2, SSTS (Revision 0), are used by Emergency Preparedness personnel to monitor the status of the TSC checksheet, as well as other similar checksheets associated with other emergency centers.



On November 17, 1993, during a routine Emergency Preparedness NRC inspection, it was discovered that documentation showing completion of a third-quarter TSC inspection/inventory checksheet was missing from records. Revision 13 of PPM 13.14.4 required Plant Administration department personnel to complete the TSC checksheet and forward the completed document to Emergency Preparedness personnel for record purposes. During interviews with personnel previously assigned to perform the TSC checksheet, it could not be determined that the inventory was completed. Revision 0 of procedure SSI 9.2.2 required Emergency Preparedness personnel to monitor the status of the checksheet. These procedure requirements were not carried to completion which resulted in the Emergency Preparedness organization's inability to produce the third-quarter TSC checksheet. The need to use both the SSTS database and procedure SSI 9.2.2 to determine the status of the checksheet is cumbersome and thus contributed to the lack of complete status checking performed by Emergency Preparedness personnel.

Corrective Steps Taken/Results Achieved

1. On November 17, 1993, Emergency Preparedness personnel verified that second and fourth-quarter 1993 TSC inventory checksheets were completed and reflected no uncorrected deficiencies.
2. On November 19, 1993, the SSTS Administrator was counseled on procedure compliance.
3. On December 15, 1993, the Plant Administration Manager briefed his staff on the importance of self-checking.
4. On January 19, 1994, the Plant Administration Manager counseled the appropriate supervisor on the importance of procedure compliance.
5. Responsibility for inventory of on/near-site emergency centers has been assumed by the Emergency Preparedness Department.
6. On January 15, 1994, the SSTS process was converted to the Passport computer program. This conversion was performed to correct weaknesses in the SSTS for documenting and managing emergency facility equipment inventory.

Corrective Action to be Taken

1. The Emergency Planning organization will closely monitor the application of the new Passport program with respect to Emergency Planning tasks. Results of the monitoring will be documented and evaluated for further action. Application of the Passport computer program will be assessed by April 29, 1994.

2. Emergency Plan Implementing Procedure PPM 13.14.4 (Emergency Equipment) will be revised and formally approved by February 16, 1994 to reflect reassignment of responsibility for emergency center inventories.

Date of Full Compliance

This violation involved a procedure-noncompliance issue in that the third-quarter TSC inspection/inventory checksheet was missing from records. As such, there was no immediate indication that the TSC was properly inventoried. Emergency Preparedness personnel verified second and fourth-quarter 1993 TSC inventory checksheets were completed and reflected no uncorrected deficiencies. Full compliance with record-keeping requirements was achieved upon completion of "Corrective Steps Taken" numbers one through six on January 19, 1994.