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 PARRISH, J.V. Washington Public Power Supply System
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SUBJECT: Respond to violation noted in insp rept 50-937/93-50 re
 Unrestrained gas cylinder being left near A train of
 standby gas treatment sys. Gas cylinder restrained until job
 completed & returned to svc.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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March 10, 1994
G02-94-058

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 93-50
 RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated February 8, 1994. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

If you have any questions or desire additional information regarding this matter please contact me or Bruce R. Hugo at (509) 377-8593.

Sincerely,

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

BRH/bk
Attachment

cc: KE Perkins, Jr. - NRC RV
 NS Reynolds - Winston & Strawn
 JW Clifford - NRR
 DL Williams - BPA/399
 NRC Site Inspector - 927N

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Appendix A

Violation

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be accomplished by procedures appropriate to the circumstances.

1. WNP-2 Plant Procedures Manual (PPM) 1.3.12, "Problem Evaluation Requests," Revision 17, states in Paragraph 6.1 that any individual who discovers a condition adverse to quality shall document the issue on a Problem Evaluation Request (PER).

Contrary to the above, when closing maintenance work request (MWR) AP4260 on September 7, 1993, licensee personnel determined that an ASME Section XI work plan had not been performed for the installation of Furmanite adapters on the valve bonnet packing chamber of valve MS-V-20. Although the licensee documented this procedure violation on September 20, 1993, this condition adverse to quality was not documented on a PER until December 16, 1993, after the NRC had questioned the condition of valve MS-V-20.

2. WNP-2 PPM 1.3.19, "Plant Material Condition Inspection Program," Revision 15, Paragraph 4.1.5(a)(8) states, "When using gas bottles, whether flammable or nonflammable, they must be properly secured against a substantial structural member with heavy rope or, preferable, chain or cable, in such a manner as to preclude them from falling over. Bottles are to be tied off both at top and at bottom (to prevent 'kick out' and falling to the floor). Bottles shall be removed from the building at the end of the work function if not permanently secured in the bottle racks."

Contrary to the above, on December 22, 1993, a compressed gas cylinder left near the "A" train of the standby gas treatment system was not restrained in any way. Additionally, several compressed gas cylinders near the containment atmospheric control system had loose restraints and restraining bolts.

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

Response to Example 1

The Supply System acknowledges the violation.

1. Reason for the violation

The reason for the failure to write the PER was personnel error. The engineer who discovered the discrepancy between the MWR and attached Furmanite work instructions did not believe that a PER was required after his investigation erroneously determined that the work had been performed as described in the MWR. The engineer incorrectly

viewed the attached Furmanite work instructions as not having the same procedural compliance requirements as the MWR.

2. Corrective steps that have been taken and the results achieved

A PER was written on December 16, 1993, documenting the failure to use an ASME Section XI work plan for the installation of Furmanite adapters on the valve bonnet packing chamber of valve MS-V-20.

A PER was written on February 3, 1994, documenting the failure to write a PER upon initial discovery of the work record discrepancy.

The engineer involved in this event was counselled on March 9, 1994, by the Maintenance Production manager on the importance of strict procedural compliance and identification of problems using the PER system. The engineer acknowledged his responsibility to meet these requirements.

3. Corrective steps that will be taken to avoid further violations

A memorandum will be issued to WNP-2 employees covering the lessons learned from this event by April 13, 1994.

4. Date when full compliance will be achieved

Full compliance was achieved on December 16, 1993, when a PER was written on the failure to use an ASME Section XI work plan for the installation of Furmanite adapters on the valve bonnet packing chamber of valve MS-V-20.

Response to Example 2

The Supply System acknowledges the violation.

1. Reason for the violation

The reason for the unrestrained gas cylinder being left near the "A" train of the standby gas treatment system was that the maintenance workers involved were unfamiliar with the requirement of PPM 1.3.19 Paragraph 4.1.5(a)(8). They believed staging the small cylinder inside a roll of hose was acceptable.

The reasons for the loose restraints and restraining bolts for cylinders near the containment atmospheric control system was the use of bolts of incorrect length for the

securing devices, and the operators who replace the nitrogen bottles not clearly understanding the seismic requirements of these restraining devices.

2. Corrective steps that have been taken and the results achieved

- a. Unrestrained gas cylinder being left near the "A" train of the standby gas treatment system:

The gas cylinder was restrained until job completion and then returned to storage.

The workers who failed to restrain the gas cylinder were retrained by their supervisor on gas cylinder storage requirements. The workers acknowledged their responsibility to ensure these requirements were met.

Training was provided to maintenance personnel covering this event and compressed gas cylinder restraint requirements.

A portable cylinder containment system was constructed and placed in use, allowing temporary cylinder restraint during work.

- b. Loose restraints and restraining bolts for cylinders near the containment atmospheric control system:

The improperly sized bolts were replaced or washers were added to permit proper tightening of the securing devices.

A entry was made in the Operations department night order book describing this problem and emphasizing the need to verify gas cylinders are properly secured. All shift managers, control room supervisors, shift support supervisors, and shift engineers signed this entry indicating they understood it.

Other permanently installed restraining devices for compressed gas cylinders were inspected. One additional restraint deficiency was found and repaired.

Shift support supervisors walked down nitrogen bottle storage locations with their equipment operators to verify the operators understood how to install the seismic restraints.

3. Corrective steps that will be taken to avoid further violations

Initial and continuing maintenance training programs will be revised to cover this event by April 15, 1994.

A memorandum will be issued to WNP-2 employees covering the lessons learned from this event by April 13, 1994.

4. Date when full compliance will be achieved

Full compliance was achieved by January 7, 1994 when the bottles were properly secured.