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BEMIS,P.R. Washington Public Power Supply System
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SUBJECT: Amends 940310 response to NRC 940208 ltr re violations noted in Insp Rept 50-397/93-50.Corrective actions:problem evaluation request written on 931216,documenting failure to use ASME Section XI work plan.

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April 12, 1994
G02-94-079

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21**
NRC INSPECTION REPORT 93-50
AMENDED RESPONSE TO NOTICE OF VIOLATION

References:
1. Letter, dated February 8, 1994, CA VanDenburgh (NRC) to JV Parrish (SS), "Notice of Violation (NRC Inspection Report No. 50-397/93-50)"
2. Letter GO2-94-058, dated March 10, 1994, JV Parrish (SS) to NRC, "NRC Inspection Report 93-50 Response to Notice of Violation"

The Washington Public Power Supply System (Supply System) replied to the Notice of Violation contained in your letter dated February 8, 1994 (Reference 1) on March 10, 1994 (Reference 2). Following discussions with WNP-2's NRC Resident Inspectors and Project Inspector, the Supply System agreed to submit an amended response to the Notice of Violation to provide additional clarifying information and details on the root causes of the problems. The amended response is provided as Appendix A (attached).

The Supply System recognizes the need to improve performance in procedural compliance. The root causes of our procedural compliance problems and the corrective actions we have initiated to address them have been described in management meetings and correspondence, including our enforcement conference of September 22, 1993 and our response to the Notices of Violation from inspection reports 93-18, 93-24, and 93-29. Although we believe these corrective actions are comprehensive and will improve our procedural adherence performance, several of them have either not yet been fully implemented or sufficient time has not elapsed to realize their full effect.

JE01

Should additional incidents of procedural noncompliance occur, we will evaluate them to determine if adjustments are needed in our planned corrective actions. The specific events you brought to our attention in Notice of Violation 93-50 were evaluated in this respect, and no adjustments to our planned corrective actions were felt to be warranted. The specific problems were therefore dealt with individually as described in Appendix A.

The Supply System will evaluate new instances of procedural noncompliance using our Problem Evaluation Request (PER) program and will make adjustments to our overall corrective actions addressing procedural compliance if needed.

Appendix B to this letter lists the commitments made in this letter and Appendix A.

If you have any questions or desire additional information regarding this matter please contact me or H. E. Kook at (509) 377-4278.

Sincerely,

P.R. Bemis (Mail Drop PE20)
Manager, Regulatory Programs

BRH/bk
Attachments

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

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 accepts 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.

To properly address this concern and corrective actions required, it must be established whether a knowledgeable and cognizant engineer should have known that a PER was necessary to document the discrepancy between the required repairs identified in the MWR and the actual actions completed in the contractor work instructions. The MWR task instructions required packing adjustment and identified a pin hole leak in the packing gland. The contractor procedure, while defining the purpose as on-line sealing of the packing gland, specifies in the working procedure that the bonnet wall will be drilled and tapped.

A review of applicable procedures, in effect when the MWR was implemented on an emergency basis on June 20, 1993, was performed to define specific procedural guidance. MWR final closeout was performed in August and revised in September 1993. Revision 16 of PPM 1.3.7, "Maintenance Work Request," was the governing procedure when the MWR was closed. Section 12.0 provides "MWR Final Closeout" requirements. Section 12.2 defines Responsible Shop Actions, and states in 12.2.1:

> "Reinstall any of the attachments (including ASME work plans) which were removed when the package was delivered to the Shift Manager."

and Section 12.2.2 states:

> "Review the package to ensure that it is complete and all of the necessary documentation and verifications were completed and are in the package."

In addressing these two items the MWR reviewer identified the discrepancy between the MWR and the actual actions completed in the contractor work instructions. The reviewer followed through by contacting the contractor who performed the work. The contractor confirmed that repairs were made to the gland, and not the bonnet wall. This phone conversation was confirmed by an independent witness. It was based on this information from the contractor that the MWR reviewer established that no ASME work plan was required.

PPM 1.3.7 Section 7.2.2c describes documentation of source documents and states that documents which contain documentation of any part of the work performed or verification of its performance shall be listed as an Attachment and retained as part of the MWR. The vendor instruction was an integral part of Section IV, "Task Instructions," included in Section 7.2.5. This section specifies a hierarchy of work instruction sources with the PPMs being the top tier for job performance. The procedure also allows the use of Vendor Instructions to augment MWR instructions as implemented

by MWR AP4260. Incorporation of vendor instructions into an MWR task instruction mandates the same level of compliance for vendor procedures as for PPMs.

The MWR final closeout constitutes an administrative, rather than a technical closeout. This conclusion is based on procedure review and intent. Package completeness review is not intended to consist of a detailed technical adequacy review that would have questioned the contractor statement regarding repair location. The detailed technical review is considered part of the package development process.

The discrepancy between the MWR and vendor instruction is a procedural violation that should have been addressed through the PER process. The applicable revision of PPM 1.3.12 (Revision 17) defines, in Section 2.1, lack of required documentation and unauthorized deviation from approved procedures as two types of problems which should be documented on PERs. The current revision of the PER procedure (Revision 18) requires identification of conditions adverse to quality that affect procedures. Adequate procedural guidance existed, and still exists, to require PER issuance.

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. Through interviews with a number of personnel, the investigator of this PER determined that this misconception was limited to the individual involved.

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

A memorandum was issued to WNP-2 employees covering the lessons learned from this event on April 8, 1994.

The Supply System recognized that the MWR procedure was a complex and lengthy procedure. As part of an independent effort to improve procedure clarity, procedure compliance, and incorporate human factors considerations, the MWR procedure was divided into specific task procedures. Separate procedures have been issued to address work implementation and final work closeout. More definitive procedural guidance is

provided regarding unclear instructions, review and understanding, self checking, and issuance of PERs to document problems affecting the operability of equipment.

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

PPM 1.3.7D, "Work Planning," will be revised to emphasize technical adequacy review during work planning prior to startup from the R-9 refueling outage.

PPM 1.3.7I, "Work Closeout Activities," will be revised to specify that work closeout activities are considered administrative prior to startup from the R-9 refueling outage.

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 accepts 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). This unfamiliarity was due to the number and complexity of administrative procedures (Volume 1 PPMs) containing these types of requirements combined with inadequate training on administrative procedures.

The reasons for the loose restraints and restraining bolts for cylinders near the containment atmospheric control system were the use of bolts of incorrect length for the securing devices, and the operators who replace the nitrogen bottles not clearly understanding management expectations for proper use of these restraining devices.

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

The extent of this problem was investigated. Additional compressed gas storage and handling problems were found following NRC identification of the cited examples, indicating a generic knowledge deficiency.

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.

An entry was made in the Operations department night order book describing this problem and emphasizing the need to verify gas cylinder restraints were tightened completely. 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 their expectations for proper installation of the seismic restraints.

A memorandum was issued to WNP-2 employees covering the lessons learned from this event on April 8, 1994.

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

Initial maintenance training programs will be revised to cover this event by April 15, 1994. This event will also be covered in fourth quarter 1994 Industry Events training provided to maintenance personnel.

An effort to simplify and clarify administrative procedures by replacing some Volume 1 PPMs and other corporate procedures with "Site Wide Procedures" is presently scheduled to be completed by September 1995. However, final determination of the scope of this effort may result in extension of this date. In the nearer term, the Volume 1 PPMs with the highest rate of noncompliance were evaluated to determine the training needed to improve performance. A training program based on this evaluation will be developed by May 2, 1994. This training program will address who will receive training and when the training will take place.

4. Date when full compliance will be achieved

Full compliance was achieved by January 7, 1994 when the bolts were tightened on the cylinders near the containment atmospheric control system (the unrestrained cylinder that had been left near the "A" train of the standby gas treatment system had been properly restrained following problem identification in December 1993.)

Appendix B

Commitments

PPM 1.3.7D, "Work Planning," will be revised to emphasize technical adequacy review during work planning prior to startup from the R-9 refueling outage.

PPM 1.3.7I, "Work Closeout Activities," will be revised to specify that work closeout activities are considered administrative prior to startup from the R-9 refueling outage.

Initial maintenance training programs will be revised to cover this event by April 15, 1994. This event will also be covered in fourth quarter 1994 Industry Events training provided to maintenance personnel.

An effort to simplify and clarify administrative procedures by replacing some Volume 1 PPMs and other corporate procedures with "Site Wide Procedures" is presently scheduled to be completed by September 1995.

A training program based on the evaluation of the Volume 1 PPMs with the highest rate of noncompliance will be developed by May 2, 1994.