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 BEMIS, P.R. Washington Public Power Supply System
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SUBJECT: Responds to violation noted in insp rept 50-397/94-04.
 Corrective actions: valves w/same deficiency changed
 to include Mode 1 specific actions. ARP added to required
 reading list for operations personnel.

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April 18, 1994
GO2-94-087

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, D. C. 20555

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 94-04
REPLY TO A NOTICE OF VIOLATION

Reference: Letter, dated March 18, 1994, CA VanDenburgh (NRC) to JV Parrish (SS),
"Notice of Violation (NRC Inspection Report No. 50-397/94-04)"

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated March 18, 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).

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

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Appendix A

Violation A

Technical Specification 6.8.1 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."

Appendix A of Regulatory Guide 1.33 recommends procedures for abnormal, off-normal, or alarm conditions, stating in paragraph 5 that, "... Each safety-related annunciator should have its own written procedure, which should normally contain... (4) the immediate operation action, and (5) the long-range actions."

Contrary to the above, on January 21, 1994, while operating in Mode 1, an alarm response procedure in the WNP-2 Plant Procedures Manual (PPM), procedure 4.601.A4, Revision 4, "RHR RPV Suction Shutdown Header Pressure High," did not contain immediate or long-range operation actions for response for operating in Mode 1.

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

Response to Violation A

The Supply System accepts the violation.

1. Reason for the violation

The cause of the procedure deficiency is the failure to include immediate or long-range operation actions for all applicable modes in the annunciator response procedures (ARPs) when they were originally developed in 1982.

Additionally, the procedures used to perform periodic reviews of the ARPs were deficient in that they did not direct reviewers to verify that appropriate operator actions were specified for all applicable operational modes.

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

PPM 4.601.A4 and three other ARPs associated with reactor coolant system interface valves with the same deficiency were changed to include the Mode 1 specific actions. In addition to making these changes in the controlled copies of the ARPs, they were added to the required reading list for operations personnel.

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

A sample of ARPs were reviewed to determine if there were additional examples of this deficiency. Although no additional deficiencies were identified, the Supply System will take the following actions to ensure ARPs specify appropriate actions for operational modes:

The procedure used to develop ARPs will be changed to specifically require that immediate and long-range operation actions be provided for applicable operational modes. This change will be completed by May 16, 1994.

The procedure used to verify and validate ARPs will be changed by May 16, 1994, to add a step to the ARP verification checklist directing the reviewer to verify that immediate and long-range operation actions are specified for applicable operational modes.

Each ARP will be checked for inclusion of immediate and long-range operation actions for applicable operational modes during its next biennial review. Any ARPs not containing these actions for all applicable operational modes will be changed to correct the deficiency.

An entry will be made in the Operations department night order book by April 20, 1994, alerting operators to the possibility that an ARP may not specify immediate and long-range operation actions for all applicable operational modes until completion of the above corrective actions. This entry will also emphasize the need to promptly correct any identified ARP deficiencies.

4. Date when full compliance will be achieved.

Full compliance was achieved on March 15, 1994, when the four alarm response procedures were changed to include immediate and long range actions for operation in Mode 1.



Violation B

10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

WNP-2 Plant Procedures Manual (PPM) 1.3.1D, Revision 2, "Conduct of Operations; Administrative Requirements," Paragraph 4.8.4, states: "The Shift Manager or Control Room Supervisor will initiate a Technical Specification [TS] Inoperable Equipment/LCO/ODCM Status sheet similar to Attachment 5.8 whenever any of the following conditions exist:

- a. A system or component required by Technical Specifications as a limiting condition for operation in the present plant mode becomes inoperable (LCO) or;
- b. A redundant system or component required by the Technical Specifications in the present mode becomes inoperable (Inoperable Equipment)."

Contrary to the above, on February 9-10, 1994, the Shift Manager did not initiate a TS Inoperable/LCO/ODCM Status sheet to track the status of the Average Power Range Monitor (APRM) Channel A, a redundant component, when licensee craftsmen performed work on APRM A that rendered it inoperable.

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

Response to Violation B

The Supply System accepts the violation.

1. Reason for the violation

The reason for the violation was inadequate training on the requirements of PPM 1.3.1D. One of the initial steps taken in the troubleshooting was to bypass APRM A, which removed it from service. The crew believed that initiation of a TS Inoperable/LCO/ODCM Status sheet was not required for a single APRM placed in bypass if the other two APRMs were operable, since the APRM trip system remains operable. Technical Specifications require two APRM channels (of the three available) be operable per trip system.

A contributing cause to this violation was that PPM 1.3.42, "Troubleshooting Plant Systems and Equipment," did not require that equipment operability be discussed during the briefing held with control room personnel prior to beginning work. The engineer knew, but did not include in his briefing, that removal of the auxiliary card would generate an APRM trip signal because it was to be blocked by placing the APRM in bypass at the start of troubleshooting.

A second contributing cause is that operators did not exhibit a "questioning attitude" in that they did not verify they understood the effects of the proposed troubleshooting.

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

An entry was made in the Operations department night order book emphasizing the requirement in PPM 1.3.1D to initiate a TS Inoperable/LCO/ODCM Status sheet whenever an APRM or similar instrument required by Technical Specifications is bypassed for any reason. This will ensure that each shift crew understands this requirement in PPM 1.3.1D.

Licensed operators were given training on abnormal events intended to exercise and develop students' intrusiveness and questioning attitude. This training was completed for all shift crews by April 8, 1994.

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

All shift managers, control room supervisors, shift support supervisors, and shift engineers will sign the Operations department night order book entry described above by April 29, 1994, indicating they understand it.

The training provided to Operations crews on the requirements of PPM 1.3.1D will be evaluated to determine the necessary changes to the operator training program. This evaluation will be completed by May 16, 1994. These training program changes will be made and training delivered to Operations crews as necessary following completion of the evaluation.

PPM 1.3.42 will be changed by June 1, 1994, to require that equipment operability be included in the briefing held with control room personnel before beginning work. All system engineers will review the changed procedure and sign for understanding it by August 1, 1994.

4. Date when full compliance will be achieved.

This violation was identified after APRM A had been returned to service; therefore, full compliance was achieved on February 10, 1994 when APRM A was declared operable.

Appendix B

Commitments

The procedure used to develop Annunciator Response Procedures (ARPs) will be changed to specifically require that immediate and long-range operation actions be specified for applicable operational modes. This change will be completed by May 16, 1994.

The procedure used to verify and validate ARPs will be changed by May 16, 1994, to add a step to the ARP verification checklist directing the reviewer to verify that immediate and long-range operation actions are specified for applicable operational modes.

Each ARP will be checked for inclusion of immediate and long-range operation actions for applicable operational modes during its next biennial review. Any ARPs not containing these actions for all applicable operational modes will be changed to correct the deficiency.

All shift managers, control room supervisors, shift support supervisors, and shift engineers will sign the Operations department night order book entry described above by April 29, 1994, indicating they understand it.

The training provided to Operations crews on the requirements of Plant Procedures Manual (PPM) 1.3.1D will be evaluated to determine the necessary changes to the operator training program. This evaluation will be completed by May 16, 1994. These training program changes will be made and training delivered to Operations crews as necessary following completion of the evaluation.

PPM 1.3.42 will be changed by June 1, 1994, to require that equipment operability be included in the briefing held with control room personnel before beginning work. All system engineers will review the changed procedure and sign for understanding it by August 1, 1994.

An entry will be made in the Operations department night order book by April 20, 1994, alerting operators to the possibility that an ARP may not specify immediate and long-range operation actions for all applicable operational modes. This entry will also emphasize the need to promptly correct any identified ARP deficiencies.

