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ACCESSION NBR: 9407180158 DOC. DATE: 94/07/08 NOTARIZED: NO DOCKET #
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AUTH. NAME AUTHOR AFFILIATION
PARRISH, J.V. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940608 ltr re violations noted in insp rept
50-397/94-18. Corrective actions: walkdown was initiated
immediately to determine if any untreated wood could be
found in plant

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 8, 1994
G02-94-157

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 94-18
RESPONSE TO NOTICE OF VIOLATION**

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 8, 1994. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of Appendix A (attached) which addresses the specifics of the Notice of Violation, and this letter which outlines Quality Assurance overview activities of the Inservice Inspection Program.

Prior to the NRC Inspection, Quality Assurance had recognized that the ISI Program had not been subject to the level of comprehensive assessment efforts appropriate to this area. The Inspection Report accurately reflects our commitment to improve our oversight of this area through current and future assessments. Ongoing assessment activity primarily involves the Mechanical Stress Improvement Process (MSIP), a project conducted during R-9 to relieve stresses on reactor pressure vessel safe-end welds.

The MSIP was chosen for assessment due to its potential safety impact and to assure adequate contractor craft and oversight performance. The scope of the assessment included: adequacy of planning and preparation, observation of work in the field, effectiveness of training, independent verification of weld locations and weld treatments, verification of stress relief calculations, and adherence to radiation protection requirements. During the MSIP assessment, QA dedicated a total of 120 hours to observation of activities in the field. This included 40

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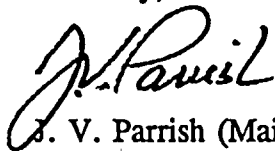
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**NRC INSPECTION REPORT 94-18
RESPONSE TO NOTICE OF VIOLATION**

hours of in-Drywell observation; including performing independent verification of the weld locations for six of the forty-four nozzles, observation of equipment set up, and the actual weld treatment of eight nozzles. The extent of these verification activities was chosen in an effort to balance ALARA considerations and the amount of observation necessary to assure work was being conducted properly.

Should you have any questions or desire additional information regarding this matter, please call me or D. A. Swank at (509) 377-4563.

Sincerely,



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

CJF/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



Appendix A

VIOLATION

During an NRC inspection conducted on May 16 - 20, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the fire protection program implementation.

Administrative Procedure 1.3.10, "Fire Protection Program Implementation," Revision 15, requires that temporary wood/blocking used in the plant shall be treated with a Underwriters' Laboratory listed pressure impregnated fire retardant process, if possible. As a minimum, it shall be treated with a painted on, flame retardant.

Contrary to the above, on May 18, 1994, the inspector observed wood stored on elevation 501 foot inside the reactor building. This wood was not treated or painted with a flame retardant.

RESPONSE TO VIOLATION

The Supply System accepts this violation.

REASON FOR THE VIOLATION

The root cause of the violation was failure to enforce existing procedural controls for use of wood in plant fire areas. The event occurred during the annual refueling outage. Maintenance activities often include use of wood for bracing, use of wooden pallets for moving equipment and supplies, etc. The existing procedure requires that all wood to be brought into the plant be either impregnated with fire retardant or treated externally with a flame retardant, and be accompanied by a Transient Combustible Permit. Untreated wood may be used only after review by the Fire Marshal, issuance of a Transient Combustible Permit, and arrangement of continuous monitoring of the material until removed. However, more structured methods are needed to facilitate compliance with these procedural requirements.

CORRECTIVE STEPS TAKEN/RESULTS ACHIEVED

1. A walkdown was initiated immediately to determine if any other untreated wood could be found in the plant. Several pieces of untreated wood were found, and promptly removed from the buildings, or in some cases treated in-situ with fire retardant paint.



2. Labels were affixed to doorways and hatches in the Reactor, Turbine-Generator, Radwaste, Diesel-Generator, Circulating Water Pump house, and Standby Service Water Pump house Buildings to warn personnel that untreated wood must not be brought into those plant areas, except as prescribed by procedure PPM 1.3.10. The labels state: "Attention! No Untreated Wood Beyond This Point. (Refer to PPM 1.3.10 for requirements) Direct questions to the Plant Fire Marshal".
3. Training was conducted to emphasize to Supply System and Bechtel maintenance, project, health physics, and construction personnel that PPM 1.3.10 requires that:
 - untreated wood generally not be used in the plant.
 - wood to be used on a temporary basis must either be impregnated with fire retardant or painted with an approved flame retardant, and
 - exceptions, if any, must be specifically reviewed and approved by the Fire Marshal.

CORRECTIVE STEPS TO BE TAKEN

Plant procedure PPM 1.3.10 will be revised by September 15, 1994 to strengthen the policy that untreated wood shall not be permitted to be brought into the plant except under unusual circumstances.

DATE OF FULL COMPLIANCE

The Supply System was in full compliance on June 6, 1994 when all untreated wood identified during the walkdown referred to above was either removed from the plant fire areas or treated in-situ with flame retardant paint.