

PRIORITY 1

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9408160269 DOC. DATE: 94/08/05 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME: AUTHOR AFFILIATION:
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION:
 Document Control Branch (Document Control Desk)

SUBJECT: Provides final status report of revised WNP-2 corrective action program.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTTR 1 ENCL 0 SIZE: 3
 TITLE: OR Submittal: General Distribution

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 LA	1 1	PD4-2 PD	1 1
CLIFFORD, J	2 2		
INTERNAL: ACRS	6 6	NRR/DE/EELB	1 1
NRR/DORS/ONDD	1 1	NRR/DRCH/HICB	1 1
NRR/DRPW	1 1	NRR/DSSA/SPLB	1 1
NRR/DSSA/SRXB	1 1	NUDOCS-ABSTRACT	1 1
OC/LFDCB	1 0	OGC/HDS3	1 0
<u>REG FILE</u> 01	1 1		
EXTERNAL: NRC PDR	1 1	NSIC	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL ~~20~~ 0

P
R
I
O
R
I
T
Y

1

D
O
C
U
M
E
N
T

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

August 5, 1994

G02-94-185

Docket No.

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
STATUS REPORT ON CORRECTIVE ACTION PROGRAM**

- References:
- 1) Letter, G02-94-016, dated January 19, 1994, JV Parrish (SS) to NRC, "Status Report on Corrective Action Program"
 - 2) Letter, G02-93-262, dated October 29, 1993, JV Parrish (SS) to NRC, "Status Report on Corrective Action Program"
 - 3) Letter, G02-93-196, dated July 29, 1993, JV Parrish (SS) to NRC, "Corrective Action Program Improvement Schedule"
 - 4) Letter, G02-93-125, dated May 27, 1993, WG Council (SS) to BH Faulkenberry (NRC), "Response to the 1993 Systematic Assessment of Licensee Performance (SALP)"

Purpose and Background

This letter provides a final status report of the revised WNP-2 Corrective Action Program (Reference 4). A commitment date extension for this submittal was approved by your WNP-2 Resident Inspector.

Reference 4 identified planned improvements to address identified concerns with our corrective action program. These improvements are in the areas of problem identification, root cause identification, implementation of corrective actions, and management oversight. These areas are discussed below.

160021

9408160269 940805
PDR ADDCK 05000397
PDR

A001
110

STATUS REPORT ON CORRECTIVE ACTION PROGRAM

Problem Identification

The corrective action program lacked consistent identification of problems which resulted in unacceptable delay in implementation of corrective actions or compensatory measures. On April 27, 1994, a new revision of the Problem Evaluation Request (PER) procedure was issued. This procedure revision, based on recommendations from the PER User's Group, streamlined the process by combining three procedures into one. Training was provided to appropriate personnel. On April 29, 1994, administrative responsibility for the corrective action program was transferred to the Quality Support Division of the Quality Assurance Directorate. The Quality Support Division also assigns responsibility, usually to a line manager, to disposition the PER. This assignment is made based on input from a review team. This function was previously performed by Work Control. Dedicated personnel within the Operating Events Analysis and Resolution (OEAR) Group, part of the Quality Support Division, are assigned to administer the program. WNP-2 engineers in the Technical Services Division and the Engineering Directorate are currently being trained on equipment operability requirements as described in NRC Generic Letter 91-18 "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and Operability." This will further improve the consistent identification of problems requiring use of the PER process.

Root Cause Identification

The corrective action program lacked accurate problem cause identification. WNP-2 has transferred the responsibility for disposition of significant conditions adverse to quality to the line organizations. Since January of 1994, 31 PERs have had a root cause evaluation, for 29 of the 31 PERs a line manager was responsible for the disposition of the PER. Fourteen of the root cause evaluations were done by the line organizations and 15 were done by OEAR root cause analysts in support of a line manager. In the future it is expected that the percentage of root cause evaluations performed by OEAR will decrease. OEAR performed many of these evaluations to free up other personnel to support the WNP-2 Maintenance and Refueling Outage. OEAR root cause analysts are also acting as root cause coaches in support of the line organizations. WNP-2 has implemented transfer of the responsibility for root cause evaluation to the line organizations.

Implementation of Corrective Actions

The corrective action program lacked effective implementation of identified corrective actions. Implementation of corrective actions are monitored and controlled by management. Heavy management emphasis is placed on completing actions by their due date. Each new PER is reviewed against previous WNP-2 events and industry experience to determine if the problem



Page Three

STATUS REPORT ON CORRECTIVE ACTION PROGRAM

is new or a repeat problem. This information is provided to the dispositioning manager for evaluation of the effectiveness of past corrective actions during disposition of the PER. Quarterly PER Trend reports are used to identify repeat events which need further assessment to determine if an adverse condition to quality exists. WNP-2 is implementing corrective action commitments and routinely evaluating the effectiveness of past corrective actions.

Management Oversight

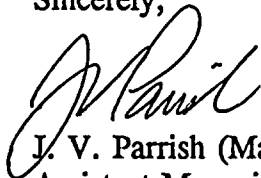
Management oversight actions were previously addressed in the January 19, 1994, status report (Reference 1).

Conclusion

In summary, the corrective action program and the upgrades described in the referenced letter are in place and are becoming more effective. Monitoring of the program has been established. Further, the reorganization of the Quality Assurance Directorate has been completed so that the directorate has assumed responsibility for administration of the program. Oversight of the program is provided by line management as PER dispositioners and reviewers. Line management is also provided periodic assessments of this area by the Quality Assurance Directorate. With the upgrades in place, monitoring and feedback processes established, and the reorganization of the QA Directorate complete, the enhancement of the corrective action program has been completed. As discussed above, improvements to the program are expected to continue to be made.

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

DAS/bk

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