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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 940722 ltr re violation noted in insp rept
 50-397/94-15. Corrective action: provided adequate training
 better assure that operability assessments will be
 documented as required by procedures.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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August 19, 1994

GO2-94-198

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 94-15
 REPLY TO A NOTICE OF VIOLATION

- References: 1) Letter, dated July 22, 1994, AB Beach (NRC) to JV Parrish (SS), "Notice of Violation (NRC Inspection Report 50-397/94-15)"
- 2) Letter, dated July 29, 1994, AB Beach (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/94-19 (Notice of Violation)"

The Washington Public Power Supply System (Supply System) hereby replies to the Notice of Violation contained in your letter dated July 22, 1994 (reference 1). Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

As requested in reference 1 the Supply System provides the following information regarding the actions taken to ensure prompt and thorough evaluation and correction of potential safety significant deficiencies:

Plant Procedures Manual (PPM) 1.3.12, "Problem Evaluation Request (PER)" and PPM 1.3.12A, "Processing of Problem Evaluation Requests (PER)" were revised to improve implementation of the guidance in Generic Letter 91-18. The revisions included specifically addressing component as well as system operability, adding an "Operable but degraded" category for operability evaluations, and emphasizing the need to continually evaluate operability.

9408310140 940819
PDR ADOCK 05000397
PDR

JEU

Beginning April 29, 1994, PERs have been reviewed on work day mornings by a cross-disciplinary team to identify potential safety significant deficiencies. This team also reviews plant and industry experience related to the PER.

The Technical Services Division Manager issued a memorandum to Technical Services personnel on June 7, 1994, emphasizing management expectations concerning the investigation, communication, and correction of plant problems.

Meetings were held with the Engineering and Technical Services staffs and other plant personnel to emphasize management expectations concerning treatment of operability issues.

Training was provided to Engineering Directorate and Technical Services Division personnel on operability assessment as part of their continuing training program. This training covered the guidance in Generic Letter 91-18, associated WNP-2 procedural requirements, and the need to continually assess operability.

Based on these actions, the Supply System believes performance in promptly and thoroughly evaluating and correcting potential safety significant deficiencies has been enhanced. Two recent examples are:

1. On July 2, 1994, a PER was written to investigate and correct a single Agastat relay failure identified during surveillance testing. A review of plant experience identified a potential generic issue with failure of continuously energized safety related Agastat relays. A second PER was written on July 15, 1994, to document and evaluate the generic impact. This evaluation included a 10 CFR 21 evaluation and a documented operability assessment showing the relays would remain operable for the time required to replace them. As a result of these actions, 52 affected relays were replaced by July 19.
2. Due to indications during the last operating cycle of moisture intrusion into a containment electrical penetration module containing non-safety related rod position indication system cables, the Supply System examined other penetrations to determine if a generic problem existed. The investigators found a problem with Westinghouse containment electrical penetration modules using Scotchguard strain relief material. The Supply System subsequently issued a 10 CFR 21 report on this problem. An operability assessment was documented and updated as new information became available. Prior to startup, 6 safety related and 3 non-safety related modules were replaced, and safety related functions from 3 modules were rerouted. A recent NRC inspection report (reference 2) noted that this problem was resolved in a technically sound manner.

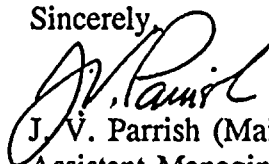
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WNP-2, OPERATING LICENSE NO. NPF-21

NRC INSPECTION REPORT 94-15, REPLY TO A NOTICE OF VIOLATION

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

Sincerely,



J. V. Parrish (Mail Drop 1023)

Assistant Managing Director, Operations

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

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Reply to Notice of Violation 94-15.


I. J. V. PARRISH, being duly sworn, subscribe to and say that I am the Assistant Managing Director, Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE 18 August, 1994


J. V. Parrish, Assistant Managing Director
Operations

On this date personally appeared before me J. V. PARRISH, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 18 day of August, 1994.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennedick, WA

My Commission Expires 4/22/98

Appendix A

Violation

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with those procedures.

WNP-2 Plant Procedures Manual 1.3.12B, Revision 0, paragraph 4.2.3a, states, "For degraded conditions impacting equipment operability identified by physical evidence at the Plant, the Prompt Operability Assessment should be completed and documented within 24 hours of when the physical evidence was identified."

Contrary to the above, the licensee failed to complete or document a Prompt Operability Assessment following its identification of significantly degraded Buna-N diaphragms in scram solenoid pilot valves for Control Rods 02-19 and 14-55, a condition impacting equipment operability, on February 9 and 17, 1994, respectively.

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

Response to Violation

The Supply System accepts this violation.

1. Reason for the violation

The reason for the violation was a judgement error by the engineer responsible for performing the Prompt Operability Assessments. The individual components did not require operability assessments since they had been previously removed from service; however, the potential generic implications did require evaluation. The engineer assessed the operability of the Scram Solenoid Pilot Valves (SSPVs) based on scram time history, the lack of additional leaking SSPVs during the January 31 half scram that identified the Control Rod 02-19 SSPV problem, and frequent discussions with General Electric Nuclear Energy and his counterparts at other boiling water reactors. The engineer's conclusion that the remaining SSPVs were operable was reasonable given the information available; however, these evaluations should have been documented as Prompt Operability Assessments.

The engineer's judgement error resulted from inadequate training on operability requirements and the requirements of Plant Procedures Manual (PPM) 1.3.12B.

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

After extensive consideration by engineering personnel and senior management, a Prompt Operability Assessment was completed on April 3, 1994. This assessment was part of the Basis for Continued Operation performed following the March 26, 1994, failure of Control Rod 06-39 to scram.

The engineer who was responsible for performing the operability assessments assisted in preparation for the enforcement conference on this issue, and attended the June 30, 1994, meeting. As a result, the engineer understands the importance of strict procedural adherence.

Meetings were held with the Engineering and Technical Services staffs and other plant personnel to emphasize management expectations concerning documentation of operability issues.

PPM 1.3.12 was revised on April 27, 1994, with the following enhancements regarding operability:

- Specifically addressed component as well as system operability
- Added 'Operable but degraded' category for evaluation
- Emphasized the continual evaluation of operability

Training was provided to Engineering Directorate and Technical Services Division personnel on operability assessment as part of their continuing training program. This training included the documentation requirements associated with the operability assessment process at WNP-2.

These actions have enhanced performance in documenting operability issues in accordance with procedures. Two recent examples are described in the cover letter accompanying this response.

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

The Supply System believes that the above actions, when taken together, provide adequate training to better assure that operability assessments will be documented as required by procedures. No additional corrective actions are considered necessary.

4. Date when full compliance will be achieved.

Full compliance with respect to the matter identified above was achieved on April 3, 1994, when a Prompt Operability Assessment was completed addressing SSPV diaphragm degradation.

