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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 21, 1994  
GO2-94-258

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
NRC INSPECTION REPORT 94-27  
REPLY TO A NOTICE OF VIOLATION**

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated October 21, 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.)

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

Sincerely,

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

PLP/ml  
Attachment

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

74-1130-0369



## Appendix A

### VIOLATION

During an NRC inspection conducted on August 7 through September 17, 1994, a 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:

- A. 10 CFR Part 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 Drawing CVI-02-71-00, 85 requires tubing support clamps to be installed on the instrument tubing connected to CAC-FT-7B.

Contrary to the above, as of September 6, 1994, an activity affecting quality was not accomplished in accordance with drawings in that tubing support clamps were not installed in two places on the instrument tubing connected to CAC-FT-7B.

This is a Severity Level IV violation (Supplement I) (397/9427-01).

### RESPONSE TO VIOLATION

The Supply System accepts this violation but requests reconsideration of the severity level because the deficiency is not safety significant. Title 10 of the Code of Federal Regulations, Part 2, Appendix C, Supplement I, provides examples of violations in each of the five severity levels as guidance in determining the appropriate severity level for violations in the area of reactor operations. The supplement describes Severity Level V as "Violations that have minor safety ... significance." The Severity Level IV example that most closely applies to this finding is "3. A failure to meet regulatory requirements that have more than minor safety ... significance." As discussed below, an operability assessment, completed September 14, 1994, for the CAC B unit in the as-found condition concluded that the unit was fully operable including the ability to respond to all design basis accidents. Because the lack of tubing clamps had no impact on the operability of the unit, the contribution of the CAC B unit to plant safety was not threatened. Therefore the lack of tubing clamps had no safety significance and should not be considered as equivalent to a Severity Level IV condition having "more than a minor safety significance." For these reasons it is requested that the severity level of this violation be reconsidered.

### REASON FOR THE VIOLATION

The cited violation is for performance of "an activity affecting quality" that "was not accomplished in accordance with drawings." However, the work instruction rather than the drawing was the method of controlling quality.



The Maintenance Work Request (MWR) Work Instructions did not require installation of tubing support clamps in accordance with the referenced CVI drawing. The direction in the MWR was to "CUT AND BEND TWO REPLACEMENT TUBING RUNS PER CVI AND INSTALL PER WELD RECORD 2-5323." The CVI drawing was a reference to determine lengths, slope and bends. Disassembly and reassembly was, and would presently be, considered within the skill of the craft.

The finding states that the CVI drawing requires tubing support clamps to be installed on the instrument tubing and states that "clamps were not installed in two places on the instrument tubing." Although the CAC units are configured for two clamps on the tubing run the CVI drawing indicates only one clamp.

Upon being notified of the missing tube clamps during the inspection, an operability assessment of the CAC B unit was performed for the as-found condition. The assessment, completed September 14, 1994, concluded that the absence of supports did not affect equipment operability. Therefore the unit was operable including the ability to respond to all design basis accidents. The absence of one or both tubing clamp(s) is therefore not safety significant.

The Supply System has evaluated this condition and concludes that it resulted from a failure to correct a discrepancy noted during performance of a maintenance activity. In performing and accepting tubing replacement to flow transmitter CAC-FT-7B a difference between the two units was noted by both the craft and QC inspector. Specifically, CAC-FT-7A had tube clamps installed while CAC-FT-7B had none. This should have initiated either corrective action to replace the missing tube clamp(s) prior to closing out the maintenance activity or a Problem Evaluation Request (PER) in accordance with PPM-1.3.12, "Plant Problems--Problem Evaluation Request", to document and resolve the condition.

The tubing replacement was completed on both CAC units by the same craft personnel and inspected by the same QC inspector. The work on CAC-FT-7B was completed June 13, and that for CAC-FT-7A on June 15, 1992. The QC inspector signed for acceptance of both units on June 15, 1992. In accepting the work for CAC-FT-7B the QC inspector noted in step 3.e of the QC Inspection Planning Report, confirming "Tubing clamps installed properly (i.e., clamps do not score or crimp the tubing)" that there were, "None installed." The tubing to CAC-FT-7A had clamps installed, CAC-FT-7B did not. The craft performing this modification stated that the clamps for CAC-FT-7B were not present on disassembly and, as a result, reassembly returned the unit to the as-found condition. However, at that time they did recognize the inconsistency between the two units and stated that a system engineer was informed of the condition. Their action was appropriate in recognizing the condition and informing the system engineer, however they did not follow up by confirming appropriate resolution of the inconsistency. The Supply System has been unable to identify any further action taken as a result of this notification to the system engineer or even to determine which system engineer was notified.

This Notice of Violation documents a problem with a maintenance activity that occurred over two years ago. The intent of the PER process has remained essentially the same since then, however the emphasis on training and personal responsibility for the process has been upgraded significantly. The 1992 performance of the craftsman, QC inspector and system engineer failed to meet management expectations by not evaluating this discrepancy for applicability to PPM 1.3.12. Had sufficient investigation occurred, it is likely that the condition would have been corrected or a PER initiated. The need to maintain a questioning attitude through problem resolution has received significant management attention since the time of this problem.

Finally, the Supply System has researched the modification and maintenance history of the CAC units, and has not been able to determine if the CAC-FT-7B tube clamps were missing during initial construction or if they had been removed at some time prior to June 1992. The CAC units, tubing and supports, were purchased as skid mounted equipment.

#### CORRECTIVE STEPS TAKEN/RESULTS ACHIEVED

~~As stated above, an operability assessment of the CAC-B unit was performed for the as-found condition upon identification of the problem. The assessment concluded that tubing failure was not credible and therefore the unit was operable.~~

The QC inspector is no longer employed by the Supply System. However, in order to benefit from this event, the details of the event and the need to maintain a questioning attitude, notify supervision of questionable inspection results and the requirement to initiate a PER upon determining that a non-conforming condition exists ~~were discussed with the craft personnel involved as well as the Quality Control organization.~~

The PER procedure and implementation process has been significantly enhanced since June 1992. Major revisions to the PER process and a change in program management were recently implemented. Training has been conducted for those individuals who could possibly identify a non-conforming condition and be responsible for initiating a PER. New employees also receive training directed at their responsibilities under the PER program as part of General Employee Training.

Management expectations have risen such that there is a continued emphasis on personal responsibility for formally recognizing inconsistent conditions within the plant and then taking the appropriate actions. ~~The tubing replacement is still considered to be within the skill of the craft.~~ However management expectations are such that upon recognizing the inconsistency, the craft would be expected to resolve the condition or document it to management. Additionally, the system engineer would be expected to follow through on notification by the craft by assuring that the issue was resolved and properly documented.

### CORRECTIVE STEPS TO BE TAKEN

Although not required for operability, the tubing clamp was installed to provide conformance to the tubing support details of the CVI drawings.

Management expectations that the system engineer is expected to follow through on notification by the craft by assuring adequate resolution and closure will be re-emphasized as a lesson learned. In addition, the discrepancy noted in this violation will be shared with the system engineers as an example of the detail of discrepancies that are expected to be identified in the detailed system walkdowns that are currently part of system engineer responsibilities.

With the system walkdowns, PER training and continued management expectations for personal responsibility under the PER program, no additional corrective steps are necessary.

### DATE OF FULL COMPLIANCE

The Supply System was in compliance with the details of the CVI drawing on November 17, 1994 when the clamp for the tubing to CAC-FT-7B was installed.

With regard to system operability, compliance to system operability requirements was confirmed on September 14, 1994, when it was determined that tubing failure was not credible and the unit was operable irrespective of the missing tube clamps.

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PARRISH, J.V. Washington Public Power Supply System  
RECIP. NAME RECIPIENT AFFILIATION  
Document Control Branch (Document Control Desk)

SUBJECT: Responds to 941021 ltr re violation noted in Insp Rept  
50-397/94-27. Corrective actions: operability assessment of  
CAC B unit performed for as-found condition upon  
identification of problem & QC inspector no longer employed.

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