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 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Provides response to violations noted in Insp Rept
 50-397/94-29. Corrective actions: timeout held w/mechanical &
 electrical craft personnel to ensure they understood proper
 storage requirements for hoists.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

January 13, 1995
GO2-95-006

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 94-29
REPLY TO A NOTICE OF VIOLATION

Reference: 1) Letter, dated December 16, 1994, AB Beach (NRC) to JV Parrish (SS),
"Notice of Violation (NRC Inspection Report 50-397/94-29)"

The Washington Public Power Supply System (Supply System) hereby replies to the Notice of Violation (NOV) contained in your letter dated December 16, 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).

The referenced letter concluded that a hoist stored out of its safe storage location with its hook down was above and adjacent to safety related instrument lines and a threat to impact the instrument lines during a seismic event. A review of the hoist fall zone and the area that would be traversed by the hook swing during a seismic event was determined not to impact the instrument lines in question.

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)
Vice-President, Nuclear Operations

JMP

Attachment 100019

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

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Appendix A

Violation

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."

Drawing M-568 (FSAR Figure 12.3-37) for WNP-2 shows the safe storage location of overhead Crane MT-HOI-8 as 3 feet from the end of the monorail, away from all safety-related equipment.

Contrary to the above, on October 14, 1994, the NRC Resident Inspector found Crane MT-HOI-8 stored approximately 15 feet from the end of the monorail with no work in progress and above safety related instrument tubing.

This is a Severity Level V violation (Supplement I) (397/9429-02).

Response to Violation

The Supply System accepts this violation.

1. Reason for the violation

Following the performance of maintenance on hoist MT-HOI-8 under Work Order (WO) JF75-01 the hoist was not returned to its designated safe storage location. The work order used PPM 10.4.10, "Jib Cranes And Electrically Operated Hoists Inspection, Maintenance, And Testing" to perform the required maintenance. The procedure was determined to be deficient because it failed to either reference or include the hoist safe storage requirements described on Drawing M-568 (FSAR Figure 12.3-37) and in PPM 10.2.53, "Seismic Requirements For Scaffolding, Ladders, Man-Lifts, Tool Gang Boxes, Hoists, And Metal Storage Cabinets."

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

To ensure hoists are properly returned to their approved safe storage locations following normal operations and maintenance activities, a "Timeout" was held with the mechanical and electrical craft personnel to ensure they understood the proper storage requirements for the hoists.

During the preparation of this NOV response the Supply System identified on December 21, 1994 that reactor building hoist MT-HOI-6 had been stored outside its approved safe storage location for approximately 12 hours. Approval of the new storage location was not obtained prior to leaving the hoist unattended. The hoist was moved to erect

scaffolding and when it could not be returned to its normal safe storage location, per PPM 10.2.53 the control room was notified. The control room instructed the contractor craft to contact Engineering to evaluate an alternate storage location for the hoist. The craft was unable to contact the individual referred to them and when their shift ended they left without informing supervision of the existing problem. An evaluation performed the following day determined that the position the hoist was left in was adequate for storage of the hoist. The contractor craft had been made aware of the need for proper hoist storage through a previous revision to PPM 10.2.53. They followed the PPM and contacted the Shift Manager but failed to follow through and ensure the as-left location was properly evaluated prior to leaving the hoist unattended. A "Timeout" was held with the contractor craft to ensure they understood the need to return hoists to their safe storage locations or have an alternate storage location approved.

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

The precautions and limitations section of the procedure used for hoist inspection, maintenance, and testing (PPM 10.4.10) will be revised by February 28, 1995 to address hoist safe storage requirements.

The alternate hoist storage requirements described on Drawing M-568 will be incorporated into a revision of PPM 10.2.53 by February 28, 1995.

4. Date when full compliance will be achieved.

Full compliance with respect to the safe storage of hoist MT-HOI-8 was achieved on October 19, 1994 when the hoist was returned to its safe storage location.