

PRIORITY 1

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR: 9501310123 DOC. DATE: 95/01/18 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 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 940831 ltr re violations noted in insp rept
 50-397/94-24. Corrective actions: one-over-one review of LCO
 entry has been instituted as mgt expectation through end of
 Mar 1995.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD4-2 PD	1 1	CLIFFORD, J	1 1
INTERNAL:	ACRS	2 2	AEOD/DEIB	1 1
	AEOD/SPD/RAB	1 1	AEOD/SPD/RRAB	1 1
	AEOD/TTC	1 1	DEDRO	1 1
	FILE-CENTER 02	1 1	NRR/DORS/OEAB	1 1
	NRR/DRCH/HHFB	1 1	NRR/PMAS/IRCB-E	1 1
	NUDOCS-ABSTRACT	1 1	OE DIR	1 1
	OGC/HDS3	1 1	RGN4 FILE 01	1 1
EXTERNAL:	LITCO BRYCE, J H	1 1	NOAC	1 1
	NRC PDR	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 20 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

January 18, 1995

GO2-95-010

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 94-24
 UPDATED RESPONSE TO NOTICE OF VIOLATION 94-24

Reference: 1) Letter GI2-94-261, dated August 31, 1994, AB Beach (NRC to JV Parrish (SS), "NRC Inspection Report 50-397/94-24 (Notice of Violation)"

Reference: 2) Letter GO2-94-230, dated September 30, 1994, JV Parrish (SS) to NRC, "Reply to a Notice of Violation"

Reference: 3) Letter GI2-94-351, dated December 8, 1994, JM Montgomery (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/94-24"

Reference 3 requested that the Supply System provide an updated response to a cited Notice of Violation. Specifically, the staff requested that actions taken or planned with regard to the apparent operator knowledge weakness in the area of Technical Specification requirements be provided. This submittal provides the requested additional information. The corrective actions identified in Reference 2 remain valid and have been completed.

The cause of the failure to recognize and enter the suppression pool level requirement for Containment Systems was personnel error. As stated in Reference 2, the operating crew did identify that the Emergency Core Cooling Systems (ECCS) requirement for the suppression pool was applicable and that the Limiting Condition for Operation (LCO) was met. Discussions with the personnel involved confirmed that they were knowledgeable of the missed Containment Systems Technical Specification, but failed to identify it after identifying and verifying compliance with the ECCS Technical Specification. As noted in Reference 2, the personnel involved have been counseled and additional training has been provided.

9501310123 950118
PDR ADOCK 05000397
Q PDR

LEO
1/10

UPDATED RESPONSE TO NOTICE OF VIOLATION 94-24

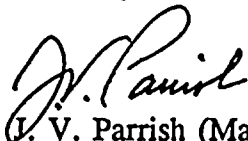
The identified failure to enter the appropriate Technical Specification is not the only example of weakness in this area. The opportunity and need to improve performance in the area of Technical Specification identification and implementation is recognized. Several actions as described below have or will be implemented.

- 1) A one-over-one review of LCO entry sheets has been instituted as a management expectation through the end of March, 1995. This provides a second check to ensure the correct Technical Specification is entered. The need for continued one-over-one reviews will be evaluated at the end of March.
- 2) Case studies are being developed to provide additional experience in the review and implementation of the Technical Specification requirements. These studies will provide both individual and crew opportunities to enhance their skills in the implementation of the Technical Specification. The case studies will be based either on past experience, recognized areas of difficulty or Technical Specification complexity. Problematic case studies will then be integrated into the licensed operator training programs as the appropriate training materials are revised.
- 3) WNP-2 is currently developing "Improved" Technical Specifications in accordance with the guidance and format provided in NUREGs 1433/1434. These new Technical Specifications are human factored to provide Operators and other plant personnel with a format that is easier to understand and follow. The "Improved" Technical Specifications for WNP-2 are currently scheduled for submittal to the NRC in late 1995. For the specific example cited regarding suppression pool level, the "Improved" Technical Specifications contain a single limiting condition for suppression pool level.

The Supply System understands the significance of correct identification and implementation of the Technical Specifications requirements. The actions listed above will support improved staff performance in this area.

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

Sincerely,



J. V. Parrish (Mail Drop 1023)
Vice-President, Nuclear Operations

DAS/ml

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