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SUBJECT: Responds to NRC 950522 ltr re violation noted in insp rept
50-397/95-09. Corrective actions: equipment replacement
interval reviewed for safety related items for which basis
for qualified life other than thermal aging. O

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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June 21, 1995
GO2-95-115

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

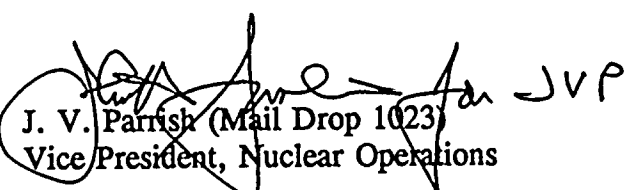
Subject: **WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 95-09, RESPONSE
TO NOTICE OF VIOLATION**

Reference: Letter dated May 22, 1995, AB Beach (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/95-09 and Notice of Violation"

The Supply System's response to the referenced Notice of Violation, pursuant to the provisions
of Section 2.201, Title 10, Code of Federal Regulations, is attached.

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)
Vice President, Nuclear Operations

CJF/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

Appendix A

VIOLATION

During an NRC inspection conducted on March 5 through April 22, 1995, 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."

Equipment Engineering Standard EQES-2, "Technical Requirements for Electrical Equipment Environmental Qualification, " Revision 4, permits extending the qualified life of components by 25 percent only for those components whose qualification was based on thermal aging.

Contrary to the above, on March 28, 1995, it was identified that the qualified life of Hydrogen Sensor 1301 had been extended by 25 percent and the sensor had not been qualified by thermal aging.

This is a Severity Level IV violation (Supplement I) (397/9509-01).

RESPONSE TO VIOLATION

The Supply System accepts this violation.

REASON FOR THE VIOLATION

The cause of the violation was inadequate standards. Engineering Standard EQES-2 uses the standard Arrhenius methodology to allow adding a 25% time increment to the maintenance interval when the technical basis for qualified life is thermal aging at design maximum abnormal operating temperatures. However, the Qualification Related Maintenance Summary (QRMS) form prepared under Engineering Standard EQES-4, "QID File Format and Organization" to specify the qualified life of an item did not clearly designate whether the data to be entered was the maintenance interval or the qualified life as predicted from technical considerations, and was ambiguous about adding the 25% time increment to the time specified. Engineers doing this repetitive work used the guidance on the QRMS form because the other pertinent standard EQES-11, "Qualification Scheduled Maintenance List, Database Management Standard for Drawing M937" did not provide any additional guidance. Therefore use of this form lent itself to a commission of errors.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Equipment replacement intervals were reviewed for safety related items for which the basis for qualified life was other than thermal aging to determine if the 25% extension had been erroneously applied. No other cases were found. Engineering Standard EQES-11 was revised to require the QRMS form differentiate between maintenance interval and qualified life. Standard EQES-4 was revised to include the new QRMS form, and to require the engineer to state both the maintenance interval and the qualified life determined from technical considerations. This change assures that both values are considered and documented by the engineer, and aids in checking that maintenance needed to preserve the qualification of the item will occur before the end of qualified life.

Engineers involved in equipment qualification were trained in use of the revised standard and QRMS form, emphasizing that the maintenance interval can be extended by 25% only for items where thermal aging of materials in a component is the basis for prediction of qualified life, and that the 25% increment should not be applied in a way that results in scheduling maintenance past the end of qualified life.

The outdated hydrogen and oxygen sensors were replaced with qualified units. Additionally, the QRMS forms for the sensors were corrected, as was the data in the maintenance scheduling system.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Based on the corrective steps taken above, no additional corrective steps are planned.

DATE OF FULL COMPLIANCE

The Supply System has been in full compliance since April 17, 1995, at which time the erroneous QRMS form and maintenance interval for the sensors had been corrected, and data in the maintenance scheduling system had been verified as having no similar errors.

