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SUBJECT: Responds to NRC ltr re violations noted insp rept
50-397/95-18. Corrective actions: counseled individuals
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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 28, 1995
GO2-95-142

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 95-18,
REPLY TO NOTICE OF VIOLATION**

Reference: Letter dated June 29, 1995, TP Gwynn (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/95-18 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

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Appendix A

VIOLATION

During an NRC inspection conducted on May 15-19, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Technical Specification 6.8.1 requires that fire protection program procedures be implemented.

Licensee Procedure 1.3.10, "Fire Protection Program Implementation," Revision 17, Section 6.5.1, prohibits fire protection system water to be used for non-fire protection activities unless both fire protection water sources are available.

Contrary to the above, on May 16, 1995, the licensee used the fire protection water system to fill the spray ponds, a non-fire protection activity, with only one water source available.

This is a severity Level IV violation (Supplement I) (397/9518-01).

RESPONSE TO VIOLATION

The Supply System accepts this violation.

REASON FOR THE VIOLATION

WNP-2 fire protection water supplies consist of Circulating Water Basins and a separate 300,000 gallon tank. Plant procedure PPM 1.3.10 allows fire protection water to be used for non-fire protection purposes providing (1) both required water sources are available together with appropriate pumps, (2) such use has been authorized by the Shift Manager and Shift Support Supervisors, and (3) the fire protection system is not in use for fire brigade training or fire fighting.

During a six day period in the Spring 1995 Maintenance and Refueling Outage, the Standby Service Water Spray Ponds were being used as the plant heat sink and the Circulating Water Basins were drained for maintenance, leaving a single source of fire protection water. This condition was permitted for a seven day period by the fire protection system operability conditions given in PPM 1.3.10. The normal water makeup system for the Spray Ponds was also unavailable due to ongoing maintenance. It became necessary to refill the Standby Service Water Spray Ponds to maintain the water levels within Technical Specification limits. A decision was made to refill the spray ponds from a fire hydrant, taking care that the inventory of the 300,000 gallon tank was maintained above minimum levels by replenishment from an

onsite well. The refilling operation occurred intermittently between May 16 and May 18, 1995, and was continuously manned to assure that it could be immediately terminated if the system were needed for fire protection purposes. The decision was inappropriate because procedure 1.3.10 allowed use of fire protection water for non-fire protection purposes only under the conditions cited above. Consequently, the cause of the violation was lack of attention to detail, leading to failure to adhere to procedures.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Use of the fire protection water was terminated at 1345 hours on May 18, 1995, as soon as it was realized that a procedural violation had taken place. The individuals involved in the decision were counseled about the importance of procedural compliance.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

This violation response will be included in the required reading for licensed and non-licensed personnel to emphasize limitations on use of fire protection water for non-fire protection purposes. This event will also be discussed with the Operations crews by the Operations Manager.

DATE OF FULL COMPLIANCE

The Supply System has been in full compliance since 1345 hours on May 18, 1995 when use of fire protection water to fill the Spray Ponds was terminated.