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SUBJECT: Forwards response to NRC 950705 ltr re violations noted in
insp rept 50-397/95-15. Corrective actions: "Time Out" was
held w/workers qualified as fire watch to reinforce
expectations.

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August 1, 1995
GO2-95-147

Docket No. 50-397

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 95-15
REPLY TO A NOTICE OF VIOLATION

Reference: Letter GI2-95-155, dated July 5, 1995, AB Beach (NRC) to JV Parrish (SS),
"NRC Inspection Report 50-397/95-15 and Notice of Violation"

The Supply System hereby replies to the referenced Notice of Violation. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

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

BRH
Attachments

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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Q PDR

JED

Appendix A

Reply to a Notice of Violation

Violation

License Condition 2.C.(14) of the WNP-2 operating license requires the licensee to implement its approved fire protection program.

Section B.3 of the WNP-2 Fire Protection Program requires all work involving ignition sources to be performed in a controlled manner.

Contrary to the above, work involving ignition sources was not performed in a controlled manner. Specifically, on May 24, 1995, a craftsman performed grinding operations on Valve CRD-V-14B, but a fire watch was not stationed continuously for 30 minutes following the hot work.

This is a Severity Level IV violation (Supplement I) (397/9515-01).

Response

The Supply System denies this violation.

The Supply System does not agree this event was a failure to perform work involving ignition sources in a controlled manner. Although the craftsman's performance was not in conformance with his training, and did not meet management expectations, his actions were adequate to ensure prompt detection and response to a incipient fire.

The Supply System investigated this event using written statements prepared by the three craftsmen involved, computer records of keycard reader data, and interviews with the NRC inspectors, craft supervision, and the WNP-2 Fire Marshall. The craftsman who spoke with the NRC inspectors was also interviewed by phone (he no longer works at WNP-2) during the preparation of this response. Attachment 1 lists the key events, with times included when available from the written statements or computer records. The craftsman performing the fire watch duties is referred to as Pipefitter A in Attachment 1.

There was a brief period when the craftsman performing fire watch duties used a phone 25 feet away in the same room. He attempted to page a coworker who had left to get a tool. His statement indicates that he returned after about two minutes, which is a plausible amount of time to make a page and wait for a reply. Due to the proximity of the phone to the work site, the Supply System believes he was still capable of seeing or smelling the smoke from an incipient fire.



As a corrective action for this failure to meet management expectations for fire watch performance, a "Time Out" was held with workers qualified as fire watch to reinforce these expectations.

The cover letter accompanying the NRC inspection report requested that this response address the apparent differences between the inspectors' findings and the results of our followup of this issue. There are only three significant differences: the time the craftsman was gone from the immediate work site while paging his coworker, the presence of an individual behind the CRD motor, and the difference between the inspectors' discussion with the craftsman and his subsequent statement.

From the chronology on Attachment 1, the time the craftsman was at the phone cannot exceed the six minutes between 1040, when his coworker left to get a pipe wrench, and 1046 when the NRC inspectors left the reactor building after confronting Pipefitter A. The time of 1040 is consistent with the time recorded for his coworker leaving the reactor building. This six minute period includes additional work on the valve by the craftsman, the discussion between the NRC inspectors and the craftsman, and the time required for the NRC inspectors to travel between the work site and the reactor building door. The Supply System therefore believes the craftsman's time away from the work site was about two minutes as stated in his written statement rather than 5 minutes as described in the inspection report.

The second difference involves the presence of the apprentice at the work site behind the CRD pump while the craftsman was using the phone 25 feet away. As described above, this individual's presence is not necessary to demonstrate compliance with our requirement to control work involving ignition sources. The Supply System believes this fire watch qualified individual was present for the following reasons:

1. The workers provided written statements stating the individual was present, after having been reminded of the consequences of providing inaccurate information. The individuals were interviewed by the pipefitter foreman and the plant Fire Marshall the day the work was performed; the information obtained was consistent with the written statements.
2. The computer key card records support the written statements, including the times given for key events. In particular, the computer records show that the apprentice was in the reactor building during the time in question. Although the computer records cannot provide more specific location information, the apprentice was providing direct assistance to the craftsmen and did not have a reason to be anywhere else in the reactor building.
3. There was a logical reason (cleaning valve parts) for the apprentice to have been in a crouched position; this activity was associated with the work being

performed. The written statements explain that he had previously left to get the solvent to perform this task; the computer records recorded his exit and reentry at the proper time to support this.

4. The Supply System agrees that it would be difficult (but not impossible) to not see a person crouched behind the CRD pump. Followup discussions with the NRC inspectors and the inspection report description of the event confirmed that the inspectors had not specifically looked directly behind the pump.

The third discrepancy documented in the inspection report is the difference between the inspectors' conversation with the craftsman and his subsequent statement. The context of this comment is that during their conversation with the craftsman, the craftsman did not state that the apprentice was acting as the firewatch while he was paging the other pipefitter. During subsequent meetings with the NRC resident inspectors, Supply System staff apparently gave the inspectors the impression that the craftsman claimed the apprentice had assumed the firewatch duties while he was at the phone. The craftsman did not make this claim, because he did not believe using the phone compromised his ability to perform firewatch duties.

When the WNP-2 Fire Marshall and pipefitter foreman initially met with the NRC, they noted the apprentice had been present to allay concerns about the significance of the event. They did not realize that the inspectors had not seen the apprentice at the work site. Since the inspectors' observations and the craftsmen's accounts of the event did not agree, the Licensing department investigated the event. Because we were concerned about the potential that inaccurate information had been provided to the inspectors, our later meeting with the inspectors to provide the results of our investigation focused on facts supporting the presence of the apprentice. This discussion may have reinforced the inspectors' belief that we felt the presence of the apprentice was necessary to demonstrate compliance with our fire protection program requirements. Thus this discrepancy appears to have been due to a miscommunication on our part in our effort to provide accurate information.

Chronology of 22 May 95 Work on CRD-V-14B

Italics = access key card reader computer records

1025 Pipefitter A begins grinding on CRD-V-14B, Pipefitter B is the fire watch. The Apprentice is also present.

1025 *NRC inspectors enter the Reactor Building via door R105.*

NRC inspectors begin first observation of work.

Apprentice leaves to get solvent.

1034 *Apprentice exits the Reactor Building via door R204.*

1037 Pipefitter A stopped grinding, needs pipe wrench. No further hot work on this valve is performed during this period.

NRC inspectors leave job site and enter adjacent pump room.

1037 *Apprentice enters the Reactor Building via door R204.*

1040 Pipefitter B leaves to get pipe wrench from tool room just as the Apprentice returns. Pipefitter A is now the fire watch.

1042 *Pipefitter B exits the Reactor Building via door R105.*

Apprentice kneels at the base of CRD-P-1B to clean valve parts.

Pipefitter A walks to tool box to get punch to remove the bonnet. He realizes a pipe wrench will not be needed.

Pipefitter A walks to phone 25' away to page Pipefitter B since pipe wrench is not needed now. He is at the phone for about two minutes.

NRC inspectors return to the work site from the adjacent pump room, they do not see anyone in the area.

Pipefitter A returns and is questioned by an inspector, states he is the fire watch. Inspector asks him if it is "legal" for him to have relieved Pipefitter B as fire watch. Pipefitter A answers yes. The inspector repeats the question. Pipefitter A tells the inspector he can be the fire watch.

NRC inspectors leave.



1046 *NRC inspectors exit Reactor Building via door R105.*

1048 *Pipefitter B enters Reactor Building via door R105.*

Pipefitter B returns to work site.

1055 Pipefitter A instructs Apprentice to remain in the area until 1110. Pipefitter A and Pipefitter B leave for lunch.

1055 *Pipefitter A and Pipefitter B leave the Reactor Building via door R105.*

1112 *The Apprentice leaves the Reactor Building via door R105.*