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 AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards response to NRC 950720 re violations noted in insp
 rept 50-397/95-19 on 950605-20. Corrective actions: PPM 1.3.1
 has been revised to include shift & relief turnover
 practices.

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August 18, 1995
GO2-95-157

Docket No. 50-397

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

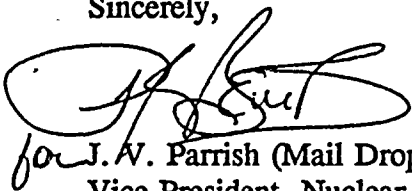
Subject: **WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 95-19, RESPONSE
TO NOTICE OF VIOLATION**

Reference: Letter dated July 20, 1995, Thomas P. Gwynn (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/95-19 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 enclosed as Attachment A. Please note our request for reconsideration of Severity Level due to lack of safety significance.

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

REB
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

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During an NRC inspection conducted on June 5-20, 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. Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:
1. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
 2. The applicable procedures required to implement the requirements of NUREG-0737."

Regulatory Guide 1.33, Appendix A, Revision 2, February 1978 lists a procedure for "Shift and Relief Turnover."

NUREG-0737, Section 1.C.2, states, "The licensees shall review and revise as necessary the plant procedure for shift and relief turnover to assure the following. . . a checklist shall be provided for the oncoming and offgoing control room operators and the oncoming shift supervisor to sign."

Technical Specification 6.8.2 states, "Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed by the POC [Plant Operations Committee] and shall be approved by the Plant Manager prior to implementation and reviewed periodically as set forth in administrative procedures."

Contrary to the above, as of June 9, 1995, the licensee did not maintain a Plant Operations Committee approved procedure for shift and relief turnover that included a shift and relief turnover checklist.

This is a Severity Level IV violation (Supplement 1) (397/9519-01).

RESPONSE TO VIOLATION

The Supply System recognizes that a violation existed, but requests reconsideration of the Severity Level due to the lack of safety significance. As outlined in our response there were Operations Department Instructions available, though not POC approved, providing assurance that shift and relief turnover guidelines, as well as turnover checklists, were available at all times.



REASON FOR THE VIOLATION

The reason for the violation was a less than adequate 10CFR50.59 review when processing a change to procedure PPM 1.3.1, "Department Policies, Programs, and Practices."

PPM 1.3.1, Rev 19, was issued in February, 1995, to consolidate requirements from PPMs 1.3.1 A,B,C, and D, and to move shift relief and turnover requirements, including turnover checklists, into lower tier Operations Instruction OI-19. Although the shift turnover checklists are not permanent plant records and are therefore not available, there appears to have been continuity of the shift turnover process when changing from a PPM to an OI. The procedure governing the 10CFR50.59 review process at the time of this violation was PPM 1.3.43, Rev. 5, "10CFR50.59 Review and Evaluation Process." PPM 1.3.43, Rev. 5, specified that a comprehensive review of both WNP-2 Technical Specifications and the Licensing Basis Documents (LBDs) should occur when performing 10CFR50.59 reviews and evaluations. PPM 1.3.43 also specified that a full text electronic database of LBD information was available to the 10CFR50.59 reviewer to help in the LBD review process. Personnel performing the 10CFR50.59 screening utilized their knowledge of Technical Specifications, as well as the electronic database, to determine that performing this aspect of the procedure change did not violate any LBD requirements. Their review of the database was limited because they only used one "keyword" to query the database regarding shift and relief turnover topics. They were inserting many "keywords" into the database because the PPM 1.3.1 change involved many topics, but inserting only one "keyword" regarding shift and relief turnover prevented them from doing a thorough search. Had they performed an expanded search by using additional "keywords," references to the requirements of Technical Specifications 6.8.1 and 6.8.2 would have been identified (this was verified by searching the database with additional "keywords"). In addition, both the preparer and reviewer were familiar with Technical Specification 6.8.1 and 6.8.2 and were aware that Appendix A of Regulatory Guide 1.33 and NUREG-0737 were referenced, but did not research the requirements of these documents because of a "mind set" that there were no key word "hits" for these documents when the database was queried.

A deviation to PPM 1.3.1, Rev. 20 was issued June 20, 1995, to restore shift and relief turnover requirements to PPM 1.3.1, as well as to address turnover checklists. It was specified by this deviation to PPM 1.3.1, Rev. 20, that the checklists located in OI-19 were to be used for shift turnover. NUREG-0737 states that "The licensees shall review and revise as necessary the plant procedure for shift and relief turnover to assure the following. . . a checklist shall be provided for the oncoming and offgoing control room operators and the oncoming shift supervisor to complete and sign." By having PPM 1.3.1, Rev. 20, specify that checklists in OI-19 be utilized, this provided the assurance required by NUREG-0737 that checklists would be used for turnover.

WNP-2 accepts this violation because a less than thorough review of the LBDs, and an overreliance on just the database, resulted in Revision 19 to PPM 1.3.1 placing the shift and relief turnover process in an Operations Instruction that was not reviewed by the Plant Operations Committee or approved by the Plant General Manager prior to its implementation. The Supply System also recognizes the responsibility that the approving procedure manager and the POC (including the POC Procedure Review Subcommittee) must exhibit to ensure that the procedure changes they approve are consistent with the LBD requirements.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The following steps have been taken to correct the procedural deficiency, and to ensure that adequate reviews of the LBDs will occur when conducting 10CFR50.59 reviews and evaluations per PPM 1.3.43, "License Basis Impact Determinations":

1. PPM 1.3.1 has been revised to include shift and relief turnover practices, including checklists. Operations Instruction 19 has been deleted. This will ensure the shift and relief turnover process is governed by a procedure which is reviewed by the POC, approved by the Plant General Manager, and reviewed periodically per the requirements of Technical Specification 6.8.2. The Supply System is considering the use of an electronic turnover checklist as a supplement to the PPM 1.3.1 turnover process. Maintaining the guidance for relief turnover practices in a PPM, in conjunction with an electronic checklist called out by the PPM, will help to assure compliance with Regulatory Guide 1.33, Revision 2, and NUREG-0737.
2. Individuals involved in the performance of the 10CFR50.59 screening have been counseled to ensure that: 1) they are aware that the electronic database is only a tool to enhance their ability to perform a thorough search of the LBDs; 2) the database should not solely be utilized to review the LBDs; and 3) a comprehensive review of the hardcopy LBDs should be performed. Additional assistance from a Subject Matter Expert should also be obtained when necessary.
3. An E-mail computer message to the work stations of qualified 10CFR50.59 preparers and reviewers has been issued with a synopsis of this Technical Specification violation, and how it could have been avoided. The E-mail message will also be copied to the approving procedure manager, POC members, and the POC Procedure Review Subcommittee members to remind them that they too are a barrier to ensure changes to procedures are consistent with the LBD requirements.



CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

The following corrective steps will be taken to help ensure adequate reviews of the LBDs will occur when conducting 10CFR50.59 reviews and evaluations per PPM 1.3.43, "License Basis Impact Determinations":

- 1) By October 10, 1995, include this incident in the initial training program for 10CFR50.59 preparers and reviewers (and refresher training when offered.) Emphasize that the electronic database is only a tool and should not be solely relied upon.
- 2) By October 10, 1995, revise PPM 1.3.43, License Basis Impact Determinations, to emphasize that the electronic database is only a tool to aid in the search of LBDs, that the database should not solely be relied upon, and that the database does not replace the need for the 10CFR50.59 preparer and reviewer to perform an indepth search of the LBDs.

DATE OF FULL COMPLIANCE

The Supply System has been in full compliance since June 20, 1995, at which time a deviation to Rev. 20 of PPM 1.3.1, "Department Policies, Programs, and Practices," was implemented to restore shift and relief turnover requirements to PPM 1.3.1, and reference the use of turnover checklists in OI-19.