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SUBJECT: Forwards response to NRC ltr re violations noted in insp
rept 50-397/95-26. Corrective actions: Performed independent
verification of valves manipulated during performance of PPM
7.4.3.3.1.53.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 3, 1995
G02-95-234

Docket No. 50-397

U. S. Nuclear Regulatory Commission
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Gentlemen:

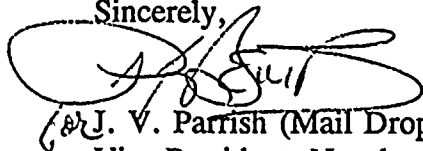
Subject: **WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 95-26
REPLY TO A NOTICE OF VIOLATION**

Reference: Letter, dated October 6, 1995, JE Dyer (NRC) to JV Parrish (SS), "Notice of Violation (NRC Inspection Report 50-397/95-26)"

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in the referenced letter. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Attachment A.

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

JMP
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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Attachment A

Violation 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."

Plant Procedure Manual (PPM) 7.4.3.3.1.53, "HPCS Initiation Drywell Pressure High A & C - CFT/CC," required a second person to verify that MS-PS-47A and C were properly valved into service.

The I&C Shop Practices Manual (SPM), revision 4, required the second person verification to be a "hands-on" verification unless the implementing procedure was revised, for as low as reasonably achievable (ALARA) considerations, to allow the second person verification to be performed using an alternative method.

Contrary to the above, on July 26, the inspector identified during performance of PPM 7.4.3.3.1.53 that the second person verification check was performed by watching the primary worker perform the valve manipulations rather than "hands-on" and no provisions were made in the procedure for this alternative means of checking valve positions.

This is a Severity Level IV violation (Supplement I) (397/9526-02).

Response to Violation

The Supply System accepts this violation.

1. Reason for the violation

The failure of the Instrumentation & Control (I&C) technician to properly perform the second person verification resulted from a lack of understanding of what was required for a second person verification. This lack of understanding resulted from the technician, not being familiar with and implementing management's expectations regarding second person verification requirements outlined in the I&C Shop Practices Manual (SPM). The second person verification requirements delineated in the SPM were specific and provided greater clarification than the guidance in plant procedures. The SPM guidance regarding second person verification was not periodically reinforced in the field or reviewed with the I&C craft.

An additional factor contributing to this lack of understanding was the inconsistent definition and application of verification process terminology used in plant procedures. This resulted in a misinterpretation as to when simultaneous, independent, and visual verifications were required or appropriate.

2. Corrective steps that have been taken and the results achieved.

An independent verification of the valves manipulated during the performance of PPM 7.4.3.3.1.53 was performed. This verification identified that the valves were in the proper position.

As an interim measure until appropriate procedure changes could be implemented clarifying the verification process, I&C shop personnel were apprised of management's expectations regarding the proper performance of a second person verification.

The I&C technicians involved were counseled regarding the failure to perform an adequate second person verification. I&C craft supervisors and the shop supervisor were also counseled for failing to ensure craft personnel were familiar with and could properly implement shop practices.

The routine use of the maintenance training process simulator during training activities reinforces management's expectations and improves maintenance craft skills dealing with activities such as the verification process and self-checking.

In an effort to improve personnel performance and ensure management's expectations are being appropriately implemented, a program has been implemented to periodically observe craft activities in the field and provide feedback to the craft.

3. Corrective steps that will be taken to avoid further violations.

Plant administrative PPMs were revised to ensure consistency of definitions associated with the verification process and the application of the process. These procedure revisions are on administrative hold until appropriate verification process training can be completed and procedures impacted by the revised verification process can be identified and revised. The training and implementation of the revised procedures will be completed by December 31, 1995.

The SPM will be revised as necessary to address I&C management's expectations regarding I&C shop administrative functions. This revision will remove from the SPM duplication of activities presently addressed in the PPMs. The SPM will be revised by December 30, 1995.

4. Date when full compliance will be achieved.

Full compliance was achieved on July 27, 1995 when the valves operated during the performance of PPM 7.4.3.3.1.53 were verified to be in their proper positions.

