



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

January 25, 1996
GO2-96-017

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

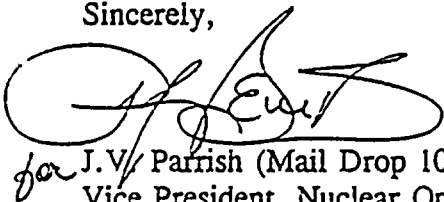
Subject: WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 95-31, RESPONSE
TO NOTICE OF VIOLATION

Reference: Letter, dated December 26, 1995, JE Dyer (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/95-31 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.

Should you have any questions or desire additional information regarding this matter, please call
me or Mr. Dave Swank at (509) 377-4563.

Sincerely,

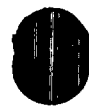


for J.V. Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

WAP
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

~~926-1300187-3pp~~



Restatement of Violation

During an NRC inspection conducted on October 15 through November 25, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

- A. Technical Specification 6.8.1.a. states, in part, that written procedures shall be established and implemented covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2.

Regulatory Guide 1.33, Appendix A, Section 8.e.(1), requires procedures covering access control to radiation areas and a radiation work permit system.

Radiation Work Permit 95000224 requires that breaches of contaminated systems outside of contaminated areas be performed using rubber gloves, health physics coverage, and provisions to collect leakage until surveyed and released from these controls by health physics.

Contrary to the above, on November 5, 1995, an equipment operator breached a contaminated system outside a contaminated area when working under Radiation Work Permit 95000224 replacing a leaking fitting on accumulator drain Valve CRD-V-107/HCU on hydraulic control Unit 26-47, but did not wear rubber gloves, did not contact health physics, and did not make provisions to collect the leakage.

This is a Severity Level IV violation (Supplement I)(397/9531-01).

Response to Violation

The Supply System accepts the violation.

Reason for Violation

While performing CRD HCU isolation an Equipment Operator (EO) removed a quick disconnect fitting from HCU 26-47. A small amount of fluid leakage occurred after removal of the disconnect. Using a cloth obtained for this purpose, the EO absorbed the leakage from the floor and surveyed the cloth for contamination. No contamination was found. The EO performed this work without HP support, and without wearing rubber gloves. He was wearing leather work gloves during this work.

The EO mistakenly assumed that HP personnel had already surveyed the HCU's and that none were found to be contaminated. Therefore, he believed that the statement in the Special Instructions of the RWP 95000224, which states,

"Outside of contaminated areas, breeches of contaminated systems should be performed using rubber gloves, HP coverage and provisions to collect leakage until surveyed and released from these controls by HP,"

did not apply to the work he was performing. Therefore, the root cause of this violation was PPM 1.3.48 cause code PE0209, Documents Not Followed Correctly.

Corrective Actions Taken and Results Achieved

PER 295-1178 was initiated to investigate the problem. A Corrective Action Plan was completed which generated the following three corrective actions.

1. The EO involved was counselled on the proper use of protective clothing and the importance of adhering to the requirements of the RWP. | (1)
2. The individual was placed on a Human Performance Improvement Plan. | (2)
3. An entry was made in the Operations Night Orders reinforcing management expectations for working on potentially contaminated systems, and for adherence to RWP requirements. | (3)

Corrective Steps That Will Be Taken to Avoid Further Violations

Consideration is being given to qualifying EOs to perform limited HP duties which apply to their job, such as checking for contamination during charging of HCU's. This would be a process enhancement, and as such is not considered a commitment.

Date of Full Compliance

The Supply System has been in full compliance since November 5, 1995, when the EO completed work on the RWP.



CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 PARRISH,J.V. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to violation noted in Insp Rept
 05-397/95-31. Corrective actions: equipment operator involved
 counselled on proper use of protective clothing & importance
 of adhering to requirements of radiation work permit.

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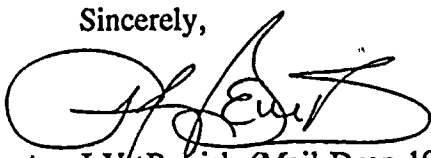
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