

CATEGORY 1

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SUBJECT: Forwards response to violations noted in Insp Rept
50-397/96-02. Corrective actions: PER 296-0152 initiated.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 18, 1996
GO2-96-085

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 96-02, RESPONSE
TO NOTICE OF VIOLATION**

Reference: Letter, dated March 19, 1996, JE Dyer (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-02 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 Ms. Lourdes Fernandez at (509) 377-4147.

Sincerely,

J.V. Parrish
Chief Executive Officer
(Mail Drop 1023)

WAP
Attachment

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
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VIOLATION A

Restatement of Violation A

10 CFR Part 50, Appendix B Criterion V states, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances.

Contrary to the above, as of January 7, 1996, Plant Procedures Manual Procedure 2.10.4, "Diesel Generator (DG) and Cable Cooling Heating, Ventilation, and Air Conditioning (HVAC)," Revision 12, dated January 11, 1996, was not appropriate to the circumstances because procedural steps (intended to troubleshoot for low DG room temperatures) did not include provisions for checking other possible causes, such as the standby DG heating and ventilation unit dampers.

This is a Severity Level IV violation (Supplement I) (397/9602-01).

Response to Violation A

The Supply System accepts the violation.

Reason for Violation A

PPM 2.10.4, DG Room HVAC System, section 5.5, DG Room Temperature Low (LT 70), did not contain adequate information and direction to identify and correct the cause(s) of low DG room temperature. In past revisions, inclusion of checks of the emergency ventilation unit dampers was considered unnecessary because the dampers were thought to be an unlikely source of outside air in-leakage. Reevaluation of the possible sources of outside air in-leakage have led to the conclusion that this potential does exist. Steps to check these dampers, and consideration of other possible contributors to cold room temperatures, will be added to the PPM.

Corrective Actions Taken and Results Achieved

PER 296-0152 was initiated.

Corrective Steps That Will Be Taken to Avoid Further Violations

PPM 2.10.4 and other associated procedures will be revised to include the appropriate level of detail and information.

Date of Full Compliance

Full compliance will be achieved when the identified procedure revisions have been completed.

VIOLATION B

Restatement of Violation B

10CFR50.59, in part, permits the licensee to make a change to the facility, as described in the safety analysis report, without prior Commission approval provided the change does not involve an unreviewed safety question. If such a change is made, the licensee is required to maintain records of the change and the records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

FSAR, Section 9.4.7.1, stated that electric heaters are designed to maintain DG rooms at a minimum temperature of 70°F during extreme weather conditions. This provides a 7°F margin above the minimum temperature of 63°F, which is required to assure DG operability. The heaters were located within DG room heating, cooling and ventilation units and were powered from a Class 1E power source.

FSAR, Section 11.3, and Table 11.3-2 describe gas coolers that are utilized in the off-gas (OG) system to cool effluents to within the design requirements of the charcoal absorbers (sic) (-40°F to +40°F).

Contrary to the above, the licensee failed in two instances to perform a written safety evaluation, which provided the bases for the determination that a change to the facility as described in the safety analysis report, was not an unreviewed safety issue.

- As of January 30, 1996, the licensee has accepted the condition that the DG room heaters could not meet the FSAR statement of maintaining the DG rooms at a minimum temperature of 70°F during extreme weather conditions. This is considered to be a de facto change to the facility, as described in the safety analysis report, and no safety evaluation was performed to determine that an unreviewed safety question did not exist.

This is a Severity Level IV violation (Supplement I) (397/9602-02).

- As of February 3, 1996, the licensee accepted the long term inoperable condition of all of the OG gas coolers. This was a de facto change to the facility as described in the safety analysis report and no safety evaluation existed which demonstrated that an unreviewed safety question did not exist.

This is a Severity Level IV violation (Supplement I) (397/9602-04).

Response to Violation B

The Supply System accepts the violation.



Reason for Violation B - Example 1

The reason for this violation example is failure of management to define and communicate expectations to personnel concerning compliance to Licensing Basis Document (LBD) design descriptions. These undefined expectations did not promote a questioning attitude and led to several missed opportunities to perform to a 10CFR50.59 safety evaluation which would have assessed and clarified the discussion of DG room temperature in the FSAR.

Two previous problem evaluations represent missed opportunities to perform the safety evaluation and to adequately address a design discrepancy reflected in the FSAR.

In November 1990, a concern was noted that EDG-1 room temperature dropped below 70°F on 11/28/90 for more than one hour. At this time, FSAR Section 9.4.7.1 stated, "electric heaters maintain diesel generator rooms at a minimum temperature of 70°F during extreme weather conditions to ensure optimum starting of the diesel generators."

A similar condition was noted in December, 1990 for EDG-3 where room temperature dropped to 66°F. As a result of this PER, Engineering evaluation documented that room temperatures as low as 63°F would not compromise the operability of the EDGs. This PER also initiated SAR Change Notice 90-127 which revised the FSAR to state the current description in section 9.4.7.1, "Electric heaters are designed to maintain diesel generator rooms at a minimum temperature of 70°F during extreme winter conditions. This provides a 7°F margin above the minimum temperature of 63°F which is required to assure diesel generator operability." Although this FSAR change provided margin from the previous 70°F room temperature requirement, it firmly stated an allowable value of 63°F, without any discussion of, or reference to, a technical basis for EDG operability. There was no 10CFR50.59 review or Justification for Continued Operation performed since room temperature had not dropped below the 63°F allowable value.

Neither of the above PERs gave a basis for the 70°F room temperature limit stated in the FSAR, nor did engineering analysis provide a suitable minimum room temperature for the EDG subsystems to support EDG standby readiness. No safety evaluation was performed which would have assessed and clarified the discussion of DG room temperature in the FSAR.

Another missed opportunity to perform a 10CFR50.59 safety evaluation was in association with the installation of temporary heaters which were installed in the DG rooms to augment and assist the installed HVAC system during periods of extreme low outside temperatures. 10CFR50.59 safety evaluations are to be performed for this type of activity through implementation of PPM 1.3.9, Temporary Modifications. This procedure contains an exemption for use of 120 or 480 volt convenience receptacles for portable tools and equipment. This statement was incorrectly interpreted as exempting portable heater installation from temporary modification requirements, therefore no 10CFR50.59 review was performed. Further evaluation clarified that this exemption applies only to the electrical distribution/load aspects of using convenience receptacles for installation of portable equipment, and is not intended to provide a generic exemption from review for other aspects of the installation of portable equipment.

Reason for Violation B - Example 1 (continued)

Preliminary engineering analysis has demonstrated that the temperature required for EDG operability is less than 63°F, and may be as low as 40°F. Consequently, approaching the over conservative FSAR temperature limit of 70°F did not affect safe plant operation, and in itself has limited safety significance. However, the Supply System considers the failure to communicate the proper expectations concerning FSAR validation and problem analysis, and the resulting lack of a questioning attitude concerning these issues, a significant problem.

Corrective Actions Taken and Results Achieved - Example 1

PER 296-0151 was initiated.

Corrective Steps That Will Be Taken to Avoid Further Violations - Example 1

Define and communicate expectations to all affected Supply System personnel concerning compliance with LBD.

Revise the FSAR and Design Specifications to accurately reflect design temperature requirements for EDGs.

Revise PPM 1.3.9, Temporary Modifications, to clarify technical and 10CFR50.59 review requirements regarding modifications with a potential to result in a de facto design change.

Revise PPM 2.10.4, DG Room HVAC System, to refer to PPM 1.3.9, Temporary Modifications, when installing temporary heaters.

Revise PPM 1.3.43, License Basis Impact Determinations, to clarify temporary modifications safety evaluation requirements.

Date of Full Compliance - Example 1

Full compliance will be achieved with the identified revisions to procedures and the FSAR.

Reason for Violation B - Example 2

The reason for this violation example is a failure of management to define and communicate expectations to Engineering personnel concerning compliance with LBD design descriptions. This resulted in failure to follow through in a timely manner on plant design changes which were initiated to the Off Gas Vault HVAC system. Follow through would have resulted in a 10CFR50.59 review and FSAR changes for the out-of-service system.

The Off Gas Vault HVAC system is designed to cool the OG effluent stream supplied to the charcoal adsorbers. The system has historically evidenced low availability and high maintenance costs. The system uses the refrigerant R-11, which has recently become more strictly regulated by the EPA. A plant modification was initiated in July 1993 to address replacement of the R-11 with another refrigerant. As this project evolved, the option of sparing the HVAC system in place was incorporated because the Off Gas system will perform the required safety function without the HVAC system. In June 1995, a safety evaluation was prepared which demonstrated that the HVAC system is not necessary for proper operation and performance of the OG system. This safety evaluation was not finalized. In August 1995, the option to spare the system in place for economic reasons was accepted by the Project Review Committee and a Basic Design Change was initiated by Engineering to define the project scope. This BDC is currently scheduled for FY96, but at the time of discovery by the Resident Inspectors there was no approved 10CFR50.59 review, and the FSAR had not been changed.

Corrective Actions Taken and Results Achieved - Example 2

PER 296-0139 was initiated.

Corrective Steps That Will Be Taken to Avoid Further Violations - Example 2

Complete the 10CFR50.59 safety evaluation to spare the OG Vault HVAC system in place and implement design and FSAR changes as appropriate.

Date of Full Compliance - Example 2

Full compliance will be achieved when the 10CFR50.59 safety evaluation and FSAR changes are completed.

Additional Examples of Failure to Update FSAR from Inspection Period 96-03

Three additional examples of failure to update the FSAR were noted in Inspection Period 96-03. These examples involved equipment which was abandoned in place using the clearance order process without update of the system description in the FSAR and performance of a safety evaluation. An additional corrective action which will be taken is to perform periodic review of older clearance orders to ensure Temporary Modifications are initiated where appropriate.