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ACCESSION NBR:9606070058 DOC.DATE: 96/05/31 NOTARIZED: NO DOCKET #
FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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SUBJECT: Responds to NRC 960501 ltr re violations noted in insp rept 50-397/96-01.Corrective actions:reviewed event w/Control Room Supervisor & sys engineer & counseled Instrumentation & Controls technician re need for self-checking.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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May 31, 1996
GO2-96-113

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 96-01, RESPONSE
TO NOTICE OF VIOLATION

Reference: Letter dated May 1, 1996, TP Gwynn (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-01 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. L. C. Fernandez at (509) 377-4147.

Respectfully,

for Paul Bemis

P. R. Bemis (Mail Drop PE20)
Vice President, Nuclear Operations

REB
Attachment

070020

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
TG Colburn - NRR
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

IE01
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RESTATEMENT OF VIOLATION

During an NRC inspection conducted on March 25-28, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 3481: June 30, 1995), the violation is listed below:

Section 6.8.1.A of the facility's Technical Specification requires that procedures be established, implemented, and maintained covering the activities of applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 9 of Appendix A, Regulatory Guide 1.33, Revision 2 states, in part, that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures.

Licensee Procedure 1.3.42, Revision 13, "Troubleshooting Plant Systems and Equipment," requires that a troubleshooting plan be developed prior to performing troubleshooting and that the troubleshooting activities be described in step-by-step detail. The procedure further requires that prior to conducting troubleshooting, a briefing involving the Control Room Supervisor/Shift Manager, work supervisor, work performer, and others, as necessary, be conducted and that prior to implementation, the troubleshooting plan be approved by two senior reactor operators. Section 4.3 of Procedure 1.3.7G, Revision 9, "Work Implementation," requires that the Operations Support Team ensure that the craft assigned to perform the Job Investigation are briefed on the limits of the Job Investigation at hand and that the craft should investigate the problem described on the Job Investigation Sheet.

Contrary to the above, on March 27, 1996, craft performing investigative troubleshooting in accordance with Job Investigation Work Sheet DIC: 1008.5 worked outside the defined scope of the plan when they performed work on the "A" channel of the Average Power Range Monitor. Job Investigation Work Sheet DIC: 1008.5 directed work to be performed solely upon the "D" channel of the Average Power Range Monitor. The investigative troubleshooting performed on the "A" channel was not preplanned, documented, briefed, nor properly authorized.

This is a Severity Level IV violation (Supplement I) 50-397/9601-01.

RESPONSE TO VIOLATION

The Supply System denies this violation.

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained covering the activities of applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A to Regulatory Guide (RG) 1.33, Revision 2, clarifies the requirements for written procedures for safety related activities by stating:

> Maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings **appropriate to the circumstances.**
>
> Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step delineation in a procedure. The following types of activities are among those that may not require detailed step-by-step written procedures ...
>
> (2) Trouble-Shooting Electrical Circuits ...

The activity performed, trouble-shooting of electrical circuits, was controlled by procedures appropriate to the circumstances. Specifically, the plant was in Mode 4, Cold Shutdown, during which the Average Power Range Monitor (APRM) and Rod Block Monitor channels are not required to be operable per Technical Specifications 3.1.4.3, 3.2.2, 3.3.1, 3.3.6, or 3.3.7.5. The activity was preplanned and controls were followed to ensure an adequate level of review and authorization.

The Instrumentation and Controls (I&C) technician performing the trouble-shooting and responsible system engineer overviewing the task were both trained and experienced individuals.

Therefore, the Supply System concludes that the performance of investigative trouble-shooting on APRM "A" on March 27, 1996 was in accordance with the requirements of 10 CFR Part 50, Appendix B, Criterion V, Technical Specification 6.8.1.a, and Regulatory Guide 1.33. In addition, the activities were conducted in accordance with WNP-2 procedures.

The activities associated with obtaining oscilloscope readings on instruments other than APRM "D" were within the bounds of the PPM 1.3.7 series of work control procedures, and these procedural controls were appropriate to the circumstances. APRM "D" was declared inoperable after demonstrating a "noisy" and unstable output. A Work Request (WR) was generated. PPM 1.3.7C, section 5.2.3, provides for the use of a Job Investigation Sheet (JIS) to investigate the problem prior to dispositioning the WR. PPM 1.3.7D, section 5.5, notes that detailed planning for a Work Order Task should include a field walkdown, and that trouble-shooting should be

done if necessary. In this instance, baseline readings of power supply outputs from other APRMs were deemed necessary to understand whether maintenance on APRM "D" was required. The responsible system engineer requested that the Operational Support Team (OST) Supervisor provide I&C technician support for obtaining output readings on the APRM power supplies. The OST Supervisor briefed the technician on the general aspects of the assignment, as required by PPM 1.3.7G, section 4.3. The defined activity was understood by the I&C technician, the system engineer, and the licensed Control Room Supervisor (CRS). A half-scram resulted when test leads were mispositioned while taking readings on APRM "A." The lead reversal error could not have been prevented by additional work instructions as correct lead placement is within the skill level of the technician.

The Notice of Violation (NOV) states that the craft performing investigative trouble-shooting in accordance with the JIS were outside the defined scope of the plan by working on the "A" channel of the APRM. No corrective maintenance was performed on APRM "A." The required power supply output readings were taken off of jacks located on the panel fronts and installed for activities of this nature. Barring the personnel error which occurred, investigative readings taken on channel "A" were non-intrusive. PPM 1.3.7G, section 4.3, directs the craft to investigate the problem described in the JIS. Therefore, this activity is within the scope of the JIS and appropriate to support the decision making process for corrective maintenance on APRM "D."

The NOV states that troubleshooting on APRM "A" was not preplanned, documented, briefed, or authorized. The system engineer planned the work with the I&C technician and briefed and received authorization from the CRS. Detailed step-by-step procedures would be excessive in this situation where attaching oscilloscope leads to a panel front connection is a skill possessed by the technician.

The Inspection Report states that the violation has been issued due to "similar recent events [having] occurred which exemplify a repeated loss of control over safety-related work activities due to procedural nonadherences..." The Supply System does not agree that the half-scram resulted from a loss of control over safety-related work activities due to procedural non-adherence. The half-scram resulted from a personnel error (i.e. reversing the leads). Obtaining readings from the panel front of the APRMs was a planned event between the system engineer and I&C technician, with briefings conducted with the CRS, and with authorization from the CRS. Additional conservatism might have been gained by placing APRM "A" in "bypass" prior to taking readings. Not having APRM "A" in bypass while obtaining readings was acknowledged as a minimal risk due to the nature of the trouble-shooting and the plant shutdown conditions. The APRMs are not required to be operable in Mode 4.

As noted by the NRC, this event had minor safety consequences. Although, the activity was within the bounds of the PPM 1.3.7 series of procedures, the procedures do not clearly differentiate between investigation and trouble-shooting. The extent the JIS process can be used to perform investigations is not clearly delineated. The procedures will be clarified.

The Supply System does not agree that the two previous events referenced in the Inspection Report support aggregation to this NOV. The Inspection Report references the previous similar events as Problem Evaluation Requests (PERs) 296-0222 and 296-0125. PER 296-0222 addresses the half-scram event cited by this NOV. PER 296-0125, though acknowledging other weaknesses in the PPM 1.3.7 series of procedures, primarily addressed emergency maintenance and post-maintenance and operability testing issues, and not investigative trouble-shooting. It is our understanding that the PER 296-0125 issue will be cited separately as an NOV addressing Supply System work practices.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Although no violation of requirements occurred, the following corrective actions were taken for the event.

1. The consequences of this event were reviewed with the CRS and the system engineer regarding the need for conservative decision making.

2. The I&C technician was counseled on the need for self-checking to prevent incidences such as this test lead reversal error.

CORRECTIVE STEPS TO BE TAKEN

As an enhancement, the PPM 1.3.7 series of procedures will be revised to clarify troubleshooting guidance and restrictions, and to identify the applicability of PPM 1.3.42, "Troubleshooting Plant Systems and Equipment."