

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9608130296 DOC. DATE: 96/08/02 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 BEMIS, P.R. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to RAI re insp. Repts 50-397/96-01. Plant procedure
 PPM 1.3.42 revised to clarify trouble shooting guidance &
 restrictions.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 PD	1 1	COLBURN, T	1 1
INTERNAL: ACRS	2 2	AEOD/SPD/RAB	1 1
AEOD/TTC	1 1	DEDRO	1 1
FILE CENTER	1 1	NRR/DISP/PIPB	1 1
NRR/DRCH/HHFB	1 1	NRR/DRPM/PECB	1 1
NRR/DRPM/PERB	1 1	NUDOCS-ABSTRACT	1 1
OE DIR	1 1	OGC/HDS3	1 1
RGN4 FILE 01	1 1		
INTERNAL: LITCO BRYCE, J H	1 1	NOAC	1 1
NRC PDR	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 19 ENCL 19

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 2, 1996

G02-96-154

Docket No. 50-397

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

Gentlemen:

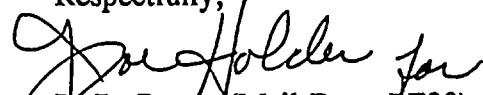
Subject: NRC INSPECTION REPORT 96-01, RESPONSE TO REQUEST FOR
ADDITIONAL INFORMATION

- References:
- 1) Letter GI2-96-118 dated May 1, 1996, TP Gwynn (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-01 and Notice of Violation"
 - 2) Letter GO2-96-113 dated May 31, 1996, PR Bemis (SS) to NRC, "WNP-2, Operating License NPF-21, NRC Inspection Report 96-01, Response to Notice of Violation"
 - 3) Letter GI2-96-175 dated July 2, 1996, SJ Collins (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-01 Response to Notice of Violation"

As requested by Reference 3, enclosed as an attachment to this letter is a further description of the corrective actions being taken to strengthen Supply System work control and troubleshooting processes. Additional comments are also provided in the attachment regarding the violation noted in Reference 1.

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,


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

Attachment

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
NS Reynolds - Winston & Strawn

TG Colburn - NRR
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

9608130296 960802
PDR ADUCK 05000397
Q PDR

JEOL
11



**NRC INSPECTION REPORT 96-01, RESPONSE TO REQUEST FOR
ADDITIONAL INFORMATION**

Attachment
Page 1 of 1

As noted in Reference 2, the Supply System is revising the PPM 1.3.7 series of work control procedures, and revising plant procedure PPM 1.3.42, "Troubleshooting Plant Systems and Equipment," to clarify troubleshooting guidance and restrictions. Additional details, though subject to change, of the planned revisions are as follows:

- PPM 1.3.7D, "Work Planning," is being revised to remove the allowance for troubleshooting and performance of corrective maintenance during a field walkdown and prior to detailed planning of a work order task.
- PPM 1.3.7G, "Work Implementation," is being revised to remove the allowance for job investigations, and to add a "precaution and limitation" to refer to PPM 1.3.42, "Troubleshooting Plant Systems and Equipment," for all troubleshooting activities.
- PPM 1.3.7G, "Work Implementation," is also being revised to redefine what work can be performed under mundane and minor work processes.
- PPM 1.3.42, "Troubleshooting Plant Systems and Equipment," is being revised to reference the PPM 1.3.7 series of procedures, to clearly state that troubleshooting determined to be low risk can be performed as minor maintenance, and to clearly state the limitations as to when low risk troubleshooting can be performed, such as only when equipment is de-energized, by-passed, or isolated.

These procedure changes will be completed by September 15, 1996.

With respect to NRC comments made in the enclosure to Reference 3, regarding the NRC's review of References 1 and 2, the following additional information is offered:

- The enclosure to Reference 3 stated that "Compensatory actions for Average Power Range Monitor A, such as bypassing it during this expanded scope investigation, were not considered."

As stated in Reference 2, these actions were considered. Not having APRM "A" in bypass while obtaining readings was acknowledged as a minimal risk due to the nature of the troubleshooting and the plant shutdown conditions. The system engineer and the Control Room Supervisor (CRS) discussed placing the equipment in bypass and determined that it was not necessary.

- Reference 3 provided a correction to Reference 1 to clarify that PERs 296-0043 and 296-0125 are examples of "similar events which exemplify a repeated loss of control over safety-related work activities due to procedural nonadherences,..."

It should be noted that both of these PERs address the same event, the discovery and repair of damaged linkage associated with DG2 outside/recirculation damper DMA-AD-21/2. The Supply System acknowledges that, although associated with the same event, the PERs document different aspects of the work control issue. Procedure enhancements have been made as a result of the DG2 damper event to strengthen work control processes.

