

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9610230058 DOC.DATE: 96/10/14 NOTARIZED: NO DOCKET #  
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 BEMIS,P.R. Washington Public Power Supply System  
 RECIP.NAME RECIPIENT AFFILIATION  
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SUBJECT: Forwards response to NRC 960912 ltr re violations noted in  
 insp rept 50-397/96-16. Corrective action: CRO Log has been  
 corrected.

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October 14, 1996  
GO2-96-197

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 96-16, RESPONSE  
TO NOTICE OF VIOLATION**

Reference: Letter, dated September 12, 1996, KE Brockman (NRC) to JV Parrish (SS),  
"NRC Inspection Report 50-397/96-16 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.

Special Inspection 96-16 was conducted by the staff to investigate a possible connection between recent occurrences dealing with reactivity management. When the two cited issues from this report were addressed at the exit meeting, the inspector characterized them as two issues of less significance. The first characterization of these issues as violations was communicated to us in Inspection Report 50-397/96-16. This is unusual and we regret that we were not afforded the opportunity and benefit of our usual discussions. It is our understanding that this method of communication is inconsistent with NRC management expectations.

These issues, although not safety significant, are recognized by the Supply System as important in that they reflect a lapse of attention to detail. We recognize the significance of Reactivity Management, which will be one of the topics of the October 22 meeting between the Supply System and NRC.

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**NRC INSPECTION REPORT 96-16, RESPONSE TO NOTICE OF VIOLATION**

Should you have any questions or desire additional information regarding this matter, please call me or Ms. Lourdes Fernandez at (509) 377-4147.

Respectfully,



P. R. Bemis

Vice President, Nuclear Operations  
Mail Drop PE23

Attachment

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



# **NRC INSPECTION REPORT 96-16, RESPONSE TO NOTICE OF VIOLATION**

Attachment A  
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## **VIOLATION A**

### **Restatement of Violation A**

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

Appendix A of Regulatory Guide 1.33, Revision 2, lists activities that should be covered by written procedures, including, "Administrative procedures for log entries and record retention...."

Procedure PPM 3.1.2, "Reactor Startup," Revision 31, step 4.2.7 states, in part, "Enter the following here and in the CRO log at the time of criticality... Time, Neutron level, Period, Control Rod Number, Control Rod Position, Coolant Temperature."

Contrary to the above, on June 27, 1996, the reactor was declared critical at 0705 hours, with a Source Range Monitor Channel A detector reading 70,000 cps, a reactor period of 345 seconds, and a reactor coolant system temperature of 211 degrees F. This data was not accurately entered in the control room operator's log as required by the startup procedure. The control room operator's log was annotated as having a neutron level of 5000 cps.

This is a Severity Level IV violation (Supplement I) (50-397/9616-01).

### **Response to Violation A**

The Supply System denies this violation.

### **Reason for Violation A**

The control room operator (CRO) made an error in transposing the source range monitor (SRM) criticality count rate from the plant startup procedure, where it was correctly recorded as 70,000 counts per second (cps), to the CRO Log where he incorrectly typed 5000 cps. The remainder of the parameters required to be recorded at criticality were transposed from the startup procedure correctly.

The incorrect value recorded in the CRO Log has since been corrected, and the CRO and the SRO who reviewed the log were counselled concerning the importance of self-checking when entering and reviewing data in the CRO Log.

Although the criticality count rate was not recorded correctly in the CRO Log, the intent of Appendix A of Regulatory Guide 1.33 and PPM 3.1.2, Reactor Startup, step 4.2.7 was met, in that the necessary information was recorded in a POC approved procedure required by Technical Specification 6.8.1a. Since the information was also available in a completed POC approved



## NRC INSPECTION REPORT 96-16, RESPONSE TO NOTICE OF VIOLATION

Attachment A  
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Technical Specification required procedure, permanent plant records correctly reflect the necessary information. This error in recording the SRM count rate in the CRO Log did not affect the calculation or declaration of reactor criticality. It would not have been used in any decision making and would therefore not have misled personnel. As such, the log error has no safety significance.

The Supply System therefore maintains that the CRO Log error does not constitute a violation of Technical Specification 6.8.1a requirements.

### VIOLATION B

#### Restatement of Violation B

WNP-2 Technical Specification 6.8.1a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, lists activities that should be covered by written procedures, including, "Administrative procedures for log entries and record retention...."

Procedure PPM 3.1.10, "Operating Data Logs," Revision 11, states, in part, "the purpose of recorder charts is to provide operations and management personnel with a permanent record of trends exhibited by specific plant parameters."

Contrary to the above, on July 27, 1996, a source range monitor recorder was supplied with linear versus the required logarithmic strip chart paper which would not serve the purpose of an accurate historical permanent record.

This is a Severity Level IV violation (Supplement I) (50-397/9616-02).

#### Response to Violation B

The Supply System denies this violation.

#### Reason for Violation B

Prior to the plant startup of June 27, 1996, control room operators installed linear chart paper in one SRM count rate recorder instead of logarithmic paper matching the scale of the instrument. Previously, linear chart paper has been used in this chart recorder when log scale paper was unavailable.





## **NRC INSPECTION REPORT 96-16, RESPONSE TO NOTICE OF VIOLATION**

**Attachment A**

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There are no procedural requirements that recorder paper matching the scale of the instrument be used. Generic (linear) chart paper is provided as a contingency in the event that chart paper matching the instrument scale is unavailable. However, it is management's expectation that paper matching the scale of the instrument be used when available and that generic paper be used only as a last resort. Despite this expectation, on this occasion the CRO replenished the recorder with linear scale paper even though log scale paper was available for use. To clarify this expectation the plant procedure governing recorder charts will be changed to require chart paper matching the scale of the recorder be used if available.

The linear scale chart paper did not affect the control room personnel's ability to track the approach to criticality. Accurate recorder readings are obtainable by direct reading of the indicator on the recorder scale without reference to the recorder ink pen or paper. Additionally, in this case, the same SRM recorders have a digital display of SRM count rate.

The chart provides operations and management personnel with a permanent record of trends exhibited by the SRM regardless of the type of paper used. The recorded data is readily retrievable by comparison of the recorder chart paper to the instrument scale. Therefore, the requirements of procedure 3.1.10 were met. As such, the use of linear chart paper has no safety significance.

The Supply System therefore maintains that use of linear versus logarithmic chart paper in the SRM count rate recorder does not constitute a violation of Technical Specification 6.8.1a requirements.