

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 S, P. R. Washington Public Power Supply System
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SUBJECT: Responds to NRC 960912 ltr re violations noted in insp rept
 50-397/96-16. CR log error was reviewed against criteria
 described in reference 3 for classification as a minor
 violation.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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October 28, 1996
GO2-96-208

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
50-397/96-16, AMENDED RESPONSE TO NOTICE OF VIOLATION**

- References:
1. Letter GO2-96-197, dated October 14, 1996, PR Bemis (SS) to NRC, "NRC Inspection Report 96-16, Response to Notice of Violation"
 2. Letter, dated September 12, 1996, KE Brockman (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-16 and Notice of Violation"
 3. NRC, Inspection Manual Chapter 0610, "Inspection Reports," dated February 2, 1996
 4. USNRC, NUREG-1600, "General Statement of Policy and Procedures for NRC Enforcement Actions," July, 1995

By Reference 1, the Supply System recently submitted a response to Inspection Report 96-16 (Reference 2). In this response, we denied Violation 50-397/9616-01. We have reconsidered this denial and accept this violation.

The Supply System believes that the control room log error is below the level of significance of a Severity Level IV violation and constitutes a minor violation consistent with the definition provided in Reference 3. Accordingly, as the minor violation has been documented in NRC Inspection Report 50-397/96-16, the Supply System requests reclassification of this violation as a Non-Cited Violation (NCV), consistent with Section IV of the NRC Enforcement Policy (Reference 4).

Specifically, the control room log error was reviewed against the criteria described in Reference 3 for classification as a minor violation as follows:

- The error did not have any actual impact on safety. The information was not used in a decision making capacity and could therefore not have misled the operators in the approach to critical evolution. The information was correctly logged into the implemented plant startup procedure (PPM 3.1.2) which constitutes a permanent plant record.

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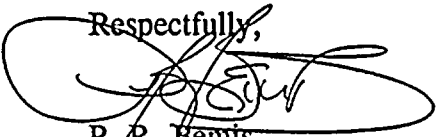
NRC INSPECTION REPORT 96-16, AMENDED RESPONSE TO NOTICE OF VIOLATION

- The error does not suggest a programmatic problem that could have a safety or regulatory impact. As discussed during our recent predecisional enforcement conference, the Supply System believes that no programmatic disregard for reactivity management exists at WNP-2. Further, the error was isolated as is evidenced by the correct entry in PPM 3.1.2, and does not constitute an adverse trend in control room log maintenance.
- The error could not be viewed as a possible precursor to a significant event. The correct count rate information was available from other sources, including the control room chart recorders, and could have been retrieved from the plant computer for a period of 30 days.
- If left uncorrected, the error would not have become a more significant concern. As stated, the error was not used in a decision making capacity and was correctly entered into the implemented startup procedure. The Supply System does recognize, however, that the control room log constitutes a legal record. Reconstruction of any events would have been possible from the correct information in the implemented startup procedure.
- There are no associated circumstances that add regulatory concern to this violation. There was no willfulness to log incorrect information. The Supply System complied with the requirement by correcting the log entry. Management involvement ensured individuals involved were counselled concerning the importance of self-checking when entering and reviewing data in the control room log.

As previously described in Reference 1, the reason for the violation is a personnel error. The corrective steps taken include correcting the log entry and counseling the individuals involved. The date full compliance was achieved was August 15, 1996 when the incorrect log entry was corrected.

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
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