

CATEGORY 1

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SUBJECT: Responds to NRC 961107 ltr re violations noted in insp rept
 50-397/96-16.Corrective actions:Full compliance was achieved
 when shift manager completed shift briefing & ended possible
 distraction that activity could have created.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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December 6, 1996
GO2-96-237

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

- References:
- 1) Letter, dated November 7, 1996, KE Brockman (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-16 and Notice of Violation"
 - 2) Letter, GO2-96-216, dated November 1, 1996, RL Webring (SS) to NRC, "NRC Inspection Report 96-16, Additional Information"
 - 3) Letter, GO2-96-208, dated October 28, 1996, PR Bemis (SS) to NRC, "NRC Inspection Report 96-16, Amended Response to Notice of Violation"
 - 4) Letter, GO2-96-197, dated October 14, 1996, PR Bemis (SS) to NRC, "NRC Inspection Report 96-16, Response to Notice of Violation"
 - 5) Letter, dated September 12, 1996, KE Brockman (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-16 and Notice of Violation"
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Jep1

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.

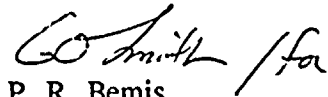
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Page 2

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
Page 1 of 4

VIOLATION A

Restatement of Violation A

WNP-2 Technical Specification 6.8.1.a 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, General Plant Operating Procedures, and Startup."

Procedure PPM 1.3.1, Conduct of Operations, Revision 26, step 4.6.2 (r) states, "Shift turnover of the control room staff is inappropriate when criticality is imminent."

Procedure PPM 1.3.1, Conduct of Operations, Revision 26, step 4.6.2b states, "The Reactor Operator at H13-P603 shall not be distracted by control room activities such as shift turnover, shift brief, or surveillances."

Contrary to the above, the inspectors identified that:

1. On July 27, 1996, shift turnover was conducted during the approach to criticality.
2. On July 27, 1996, the shift manager conducted the shift brief while the CRS returned to the at-the-controls area to oversee control rod withdrawals at the approach-to-criticality.

This is a Severity Level IV violation (Supplement I) (50-397/9616-03).

Response to Violation A

The Supply System accepts the violation.

Reason for Violation A

Regarding part 1 of Violation A, the oncoming and offgoing Control Room Supervisors (CRS) did conduct their turnover just prior to when criticality was imminent. Prior to the turnover the offgoing CRS observed the neutron instrumentation and the control rod pull sheet and judged that the reactor was not in the "approach-to-criticality" range. As the CRSs were completing their turnover the announcement was made that criticality was imminent. They immediately finished their turnover transferring the Reactivity Manager responsibilities, and both CRSs approached the control board to attend directly to reactivity maneuvers.



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

Attachment

Page 2 of 4

The Supply System believes that the shift turnover activities were well planned, proper attention was given to approach-to-critical activities by control room personnel, and the roll of Reactivity Manager was attended to properly by the CRSs. However, we recognize that the phrase approach-to-critical is not well defined in our procedures. Accordingly, we have changed our conduct of operations procedure to better define this term to eliminate any possible confusion in the future regarding the meaning of this phrase.

Regarding part 2 of Violation A, the Shift Manager did conduct a shift briefing during approach-to-critical activities. Prior to the oncoming shift arriving, the offgoing control room personnel discussed the plan for conducting the various turnovers. It was decided that the CRSs could complete their turnover prior to approach-to-criticality, and since the Control Room Operator (CRO) and Shift Engineer were holding over and had no need to participate in the shift briefing the Shift Manager could conduct the shift briefing while the CRS, CRO and Shift Engineer attended to the approach to criticality.

Corrective Actions Taken and Results Achieved

Reference 2 provides a comprehensive list of the corrective actions taken as a result of our investigation into the three reactivity management issues addressed in Reference 5 and discussed at the recent pre-decisional enforcement conference. The corrective actions specifically applicable to this violation which have been completed are items 5, 13, 15 and 25.

Corrective Steps That Will Be Taken to Avoid Further Violations

Reference 2 provides a comprehensive list of the corrective actions taken as a result of our investigation into the three reactivity management issues addressed in Reference 5 and discussed at the recent pre-decisional enforcement conference. The corrective actions specifically applicable to this violation which are yet to be completed are items 27 and 28.

Date of Full Compliance

Full compliance was achieved when the Shift Manager completed the shift briefing and ended the possible distraction that activity could have created.

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

Attachment

Page 3 of 4

VIOLATION B

Restatement of Violation B

Criterion V of 10 CFR 50, Appendix B, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances... These instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

WNP-2 Technical Specification 6.8.1.a 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, recommends procedures covering the reactor recirculation system.

Contrary to the above, Procedure PPM 8.3.339, "Test Instructions - Reactor Recirculation (RRC) Adjustable Speed Drive (ASD) and Reactor Digital Feedwater (DFW) Control Power Ascension Test Program," Revision 1, was inadequate. The procedure did not contain sufficient instructions to preclude the manipulation of facility controls as expressly prohibited by 10 CFR 50.54(i), in that, the reactor recirculation control system was operated by a non-licensed individual on July 20, 1996.

This is a Severity Level IV violation (Supplement I) (50-397/9616-05).

Response to Violation B

The Supply System accepts the violation.

Reason for Violation B

The Supply System failed to properly control the activities of a contract test engineer during ASD testing. This resulted in the engineer's inadvertent changing of recirculation pump speed. A discussion of this event, the precautions taken prior to the event, and a summary of the corrective actions taken immediately after the event were provided to the staff during the recent pre-decisional enforcement conference.

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

Attachment

Page 4 of 4

Corrective Actions Taken and Results Achieved

The ASD testing was stopped and a site-wide Timeout for all employees was conducted. Reference 2 provides summary of the Timeout and provides a comprehensive list of the corrective actions taken as a result of our investigation into the three reactivity management issues addressed in Reference 5 and discussed at the recent pre-decisional enforcement conference. The corrective actions specifically applicable to this violation which have been completed are items 5, 18, 22, 23 and 24.

Corrective Steps That Will Be Taken to Avoid Further Violations

All corrective actions have been completed.

Date of Full Compliance

Full compliance was achieved when the ASD test procedure was revised to ensure only licensed personnel take actions that could impact reactor power.