

CATEGORY 1

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SUBJECT: Forwards response to NRC 970205 ltr re violations noted in
 insp rept 50-397/96-26. Corrective actions: modified channel
 check procedure to use alternate source of core flow data
 instead of MS-SUM-608.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

March 6, 1997
GO2-97-046

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21,
NRC INSPECTION REPORT 96-26, RESPONSE TO
NOTICE OF VIOLATION**

Reference: Letter dated February 5, 1997, JE Dyer (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/96-26 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. Lourdes Fernandez at (509) 377-4147.

Respectfully,


P. R. Bemis

Vice President, Nuclear Operations
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Attachment

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NRC INSPECTION REPORT 96-26, RESPONSE TO NOTICE OF VIOLATION

Attachment A
Page 1 of 3

VIOLATION A

Restatement of Violation

10 CFR Part 50, Appendix B, Criterion XII (Control of Measuring and Test Equipment) states, "Measures shall be established to assure that ...instruments, and other measuring and testing devices used in activities affecting quality are properly...calibrated."

Contrary to the above, on January 16 and 17, 1997, the total core flow meter summing circuit (MS-SUM-608) was out of calibration and was utilized to perform Technical Specification Surveillance 4.3.1.1-1.2.b, "Average Power Range Monitor Flow Signal Channel Check" (an activity affecting quality).

This is a Severity Level IV violation (Supplement I).

Response to Violation

The Supply System accepts the violation.

Reason for Violation

During the course of single loop ASD testing on June 11, 1996, it was discovered that the MS-SUM-608 (total core flow summer with one recirculation pump running) was out of calibration. This summer is used to provide total core flow indication in the control room and as a computer input for core performance monitoring when in single loop operation. On two occasions after entering single loop operation on January 15, 1997, the out-of-calibration summer was used to perform the Average Power Range Monitor Flow Signal channel check required by Technical Specifications. The channel check passed the associated surveillance test on January 16, but failed the surveillance test on January 17.

The cause of the violation was a delay in the calibration of MS-SUM-608 after discovery of the out-of-calibration condition during single loop ASD testing on June 11, 1996. After discovery of the condition, a work request was written to verify calibration of the summer. The work request was initially designated as Priority 1 and recommended as a startup restraint by the group establishing work priority. Verification of the out-of-calibration condition was completed on a Job Investigation Sheet (JIS) and planning personnel generated an on-demand preventative maintenance (PM) work order task to perform the calibration. When the PM work order reached the control room to be reviewed by the Shift Manager, control room personnel were involved in post-outage plant startup. The Shift Manager at the time deferred performance of the work because the plant was starting up in two loop recirculation mode, and therefore there was no immediate need for the single loop recirculation flow summer. After this initial deferral of the work by the Shift Manager, performance of this calibration was delayed in the work control process due to lost priority information. Later investigation revealed that in transferring data from the Priority 1 work request to the PM task work order, some of the relevant information regarding work priority was not transferred. The PM task work order was designated Priority 2 which



NRC INSPECTION REPORT 96-26, RESPONSE TO NOTICE OF VIOLATION

Attachment A

Page 2 of 3

is normally performed as part of the 12-week work planning schedule. Subsequently, due to the lack of relevant priority information, the work was deferred, and as of January 15, 1997, the calibration had not been performed.

Further investigation revealed there were other failed barriers which could have precluded this event. The first failed barrier involved the removal of the control room deficiency tag associated with the work request. When the initial Priority 1 work request was closed out the associated deficiency tag was removed because there was no reference to the on-demand PM work order which was generated from the work request.

The second failed barrier involved inconsistent formatting of the instrument data sheet for MS-SUM-608. Typically, the data sheet for this type of summer shows the 5 point checks for both channel 1 and 2 gain tests on the front page. However, the data sheet for MS-SUM-608 shows only the 5 point checks for channel 1 gain test on the front page, and channel 2 checks are shown on an addenda. Due to this inconsistency in the format of the data sheet, and the lack of a questioning attitude by station I&C technicians, the channel 2 checks were inconsistently performed. The channel 2 checks for MS-SUM-608 have been shown on the addenda to the data sheet since 1983. The only documented channel 2 data for MS-SUM-608 was recorded in 1984.

MS-SUM-608 was not used as a source for total core flow in the subject surveillance until 1994 when it was added to the procedure. Since that time the plant has not been operated in single loop mode. Therefore, this instrument was not used in any Technical Specification surveillance application prior to this event.

An evaluation was performed to determine the appropriateness of using MS-SUM-608 and its associated recorder MS-FR-613 as a source of core flow for the subject surveillance procedure. The evaluation revealed that either MS-SUM-608/MS-FR-613 or MS-FI-611A(B) could serve in this application if properly calibrated.

Corrective Actions Taken and Results Achieved

An immediate corrective action was taken to modify the channel check procedure to use an alternate source of core flow data instead of MS-SUM-608. The channel check was then performed successfully.

A complete calibration of MS-SUM-608 was performed including the five point checks for both channels 1 and 2.

The data sheets for MS-SUM-608 was revised to show the channel 1 and 2 check requirements in a manner consistent with data sheets for other summers.

All flow summer data sheets were checked to assure the 5 point checks on the front of the data sheet vary all inputs. No other instances of this problem were found.

NRC INSPECTION REPORT 96-26, RESPONSE TO NOTICE OF VIOLATION

Attachment A

Page 3 of 3

Corrective Steps That Will Be Taken to Avoid Further Violations

Review and revise the work management software user's guide to specify the information fields that should be transferred from the work request to an on-demand model work order in order to ensure proper tracking, trending, repair, PMT, and prioritization.

Develop and implement a training module to reinforce the procedural requirements for pulling or modifying plant deficiency tags when cancelling, completing, or modifying a minor maintenance work request into a work order.

Develop and implement a training module for all priority review group members to discuss the need to accurately prioritize work. This will include an overview of this event.

Evaluate work priority methodologies to determine if adjustments are warranted to improve evaluation, prioritization, and completion of corrective maintenance tasks.

Develop and implement a refuel outage start up checklist that identifies all work requests and work orders that must be completed prior to plant start up.

Discuss this event with I&C personnel, focusing on the inconsistent formatting of the instrument data sheet which resulted in incomplete calibrations of the instrument since 1984. Discussion will focus on this as an opportunity for a questioning attitude to prevent errors.

Date of Full Compliance

The date of full compliance was January 18, 1997, when the channel check required by Technical Specifications was performed successfully using an alternate instrument as the source for total core flow.