

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9802190249 DOC. DATE: 98/02/12 NOTARIZED: NO DOCKET #
FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 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 NRC 980115 ltr re violations noted in insp rept
50-397/97-18. Corrective actions: five ladders standing in
reactor water cleanup pump & heat exchanger rooms were
immediately removed & stored properly.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
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	POSLUSNY, C	1 1
INTERNAL: ACRS.	2 2	AEOD/SPD/RAB	1 1
AEOD/TTC	1 1	DEDRO	1 1
FILE CENTER	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	NUDOCS FULLTEXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 19 ENCL 19



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 12, 1998
GO2-98-029

Docket No. 50-397

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

Gentlemen:

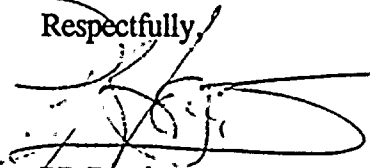
Subject: WNP-2, OPERATING LICENSE NPF-21,
NRC INSPECTION REPORT 97-18, RESPONSE
TO NOTICE OF VIOLATION

Reference: Letter dated January 15, 1998, TP Gwynn (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/97-18 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
Mr. PJ Inserra at (509) 377-4147.

Respectfully,


PR Bemis
Vice President, Nuclear Operations
Mail Drop PE23

Attachment

cc: EW Merschhoff - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
TG Colburn - NRR

NRC Sr. Resident Inspector - 927N
DL Williams - BPA/399
PD Robinson - Winston & Strawn

9802190249 980212
PDR ADDCK 05000397
Q PDR



NRC INSPECTION REPORT 97-18, RESPONSE TO NOTICE OF VIOLATION

Attachment A

Page 1 of 4

VIOLATION A

Restatement of Violation

- A. WNP-2 Technical Specification 5.4.1.a requires written procedures to be established, implemented, and maintained for those activities outlined in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Appendix A of Regulatory Guide 1.33 recommends that administrative procedures be developed for, among others, control of plant equipment.

Licensee Plant Procedure Manual (PPM) 10.2.53, "Seismic Requirements for Scaffolding, Ladders, Man-Lifts, Tool Gang Boxes, Hoists, and Metal Storage Cabinets," Revision 16, provides instructions for proper installation and storage of these types of equipment. In designated areas, PPM 10.2.53 requires, in part, that: (1) following use, ladders be stored in an approved storage location or laid down on the floor, (2) wheeled carts be properly chocked to prevent rolling, and (3) unrestrained storage cabinets with aspect ratios greater than 2 be placed no closer than the height of the cabinet plus 12 inches from any safety-related equipment.

Contrary to the above, between November 5 and December 20, 1997, while the plant was operating in Mode 1, the licensee failed to implement the requirements of PPM 10.2.53 as evidenced by the following examples:

1. Five ladders not in current use were identified in the reactor water cleanup heat exchanger and pump rooms that were standing and not properly stored or laid down on the floor.
2. Two wheeled scaffold carts were identified in the Division I emergency diesel generator room and the diesel generator building corridor that were not adequately chocked to prevent rolling during a seismic event.
3. A large storage cabinet, with an aspect ratio greater than 2, was identified on the 501 foot elevation of the reactor building whose placement was within the height of the cabinet plus 12 inches of safety-related equipment.

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

Response to Violation A

The Supply System accepts the violation.

NRC INSPECTION REPORT 97-18, RESPONSE TO NOTICE OF VIOLATION

Attachment A

Page 2 of 4

Reason for Violation A

The Supply System agrees with the staff's characterization of these events as given in the Violation and Report Details of the Reference.

Examples 1 and 3 of violation of the procedural requirements of PPM 10.2.53 were caused by inattention to detail and failure to self check for seismic restraint concerns for temporary structures and equipment in the plant. For Example 2, the wheel brakes on the subject carts were checked to be in the locked position by the workers in the plant, but the brakes were subsequently found to be degraded.

Corrective Actions Taken and Results Achieved

For example 1, the five ladders standing in the reactor water cleanup pump and heat exchanger rooms were immediately removed and stored properly.

For example 2, the scaffolding cart wheel brakes were immediately adjusted to prevent movement.

For example 3, scaffolding piping was immediately erected around the subject cabinet as a restraining measure, and plant engineering personnel conducted a walkdown of the reactor building to ensure no similar conditions existed. No similar conditions were found. The subject cabinet was subsequently removed from the area on December 22, 1997.

Corrective Steps That Will Be Taken to Avoid Further Violations

Plant procedure PPM 1.3.19, Plant Materiel Condition Inspection Program, will be revised to improve housekeeping in all areas containing plant equipment. As a part of this program personnel will conduct routine inspections for general housekeeping concerns, to include the specific requirements contained in plant procedures PPM 10.2.53, Seismic Requirements for Scaffolding, Ladders, Man-Lifts, Tool Gang Boxes, Hoists, and Metal Storage Cabinets and PPM 1.3.10C, Control of Transient Combustibles.

Plant personnel will receive training concerning these three events to include the root cause and corrective actions taken and, if necessary, the training will include instruction concerning the revised requirements of PPM 1.3.19.

Date of Full Compliance

All three conditions were promptly corrected after being identified. The date of full compliance for the most recently identified condition was December 18, 1997, when the restraints were placed around the cabinet identified in example 1 as a temporary measure.

NRC INSPECTION REPORT 97-18, RESPONSE TO NOTICE OF VIOLATION

Attachment A

Page 3 of 4

VIOLATION B

Restatement of Violation

- B. WNP-2 Technical Specification 5.4.1.d requires procedures to be established, implemented, and maintained for the Fire Protection Program.

Licensee Procedure PPM 1.3.10C, "Control of Transient Combustibles," Revision 0, provides instructions for evaluating and tracking transient combustible materials in the plant. For "combustible-free zones," as defined by PPM 1.3.10C, unattended transient combustible materials are prohibited. For Fire Protection vital areas, including the reactor building, a transient combustible permit is required to be processed when the quantity of transient combustible material exceeds the guidelines of Attachment 9.2 to PPM 1.3.10C.

Contrary to the above, as of December 1, 1997, while the plant was operating in Mode 1, the licensee failed to meet the requirements of PPM 1.3.10C, as evidenced by the following examples:

1. Unattended transient combustible material, including small amounts of trash and scrap wood, and a large plastic bag containing batting insulation, were identified in the 492 foot horizontal pipe chase in the reactor building, an area designated by PPM 1.3.10C as a "combustible-free zone."
2. Approximately 300 feet of rubber hosing and small amounts of tygon tubing and Class A combustibles were identified in the mezzanine area of the traversing incore probe room. Although the quantity of material exceeded the guidelines of Attachment 9.2 of PPM 1.3.10C for requiring a transient combustible permit, a permit had not been processed to evaluate and track the material.

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

Response to Violation B

The Supply System accepts the violation.

Reason for Violation B

The Supply System agrees with the staff's characterization of these events as given in the Violation and Report Details of the Reference.

These examples of failures to follow the procedural requirements of PPM 1.3.10C were caused by inattention of plant workers to transient combustible concerns in areas which are infrequently accessed. This inattention to plant housekeeping concerns was enabled by a lack of management focus on housekeeping in these areas.

NRC INSPECTION REPORT 97-18, RESPONSE TO NOTICE OF VIOLATION

Attachment A

Page 4 of 4

Corrective Actions Taken and Results Achieved

The items identified in examples 1 and 2 were promptly removed from the areas and appropriately stored.

A complete inspection of all infrequently accessed plant areas was conducted and any inappropriate material found was removed.

The results of the above referenced inspection was documented in an itemized list of the areas and the material found. This list was included in an E-mail from the Plant Manager to the affected managers including plant maintenance contractor management. The E-mail reiterated management's expectation that procedural requirements related to plant housekeeping shall be followed, and that ALARA concerns should not be an excuse for not cleaning a work area upon completion of tasks because work area cleanup is addressed as part of the ALARA review and planning process.

Corrective Steps That Will Be Taken to Avoid Further Violations

The E-mail referenced above from the Plant Manager will be used to conduct training of plant employees of each affected department.

Plant procedure PPM 1.3.19, Plant Materiel Condition Inspection Program, will be revised to improve housekeeping in all areas containing plant equipment. As a part of this program personnel will conduct routine inspections for general housekeeping concerns, to include the specific requirements contained in plant procedures PPM 10.2.53, Seismic Requirements for Scaffolding, Ladders, Man-Lifts, Tool Gang Boxes, Hoists, and Metal Storage Cabinets and PPM 1.3.10C, Control of Transient Combustibles.

Plant personnel will receive training concerning these two events to include the root cause and corrective actions taken and, if necessary, the training will include instruction concerning the revised requirements of PPM 1.3.9, Plant Materiel Condition Inspection Program.

A self assessment will be performed at a later date to determine the effectiveness of these corrective actions in improving the materiel condition of areas of the plant which are infrequently accessed.

Date of Full Compliance

The two conditions specified in examples 1 and 2 were promptly corrected after being identified. The date of full compliance for these conditions was November 24, 1997.