

CATEGORY 1

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SUBJECT: Responds to NRC 980209 ltr re violations noted in insp rept
 50-397/97-13 on 970715-0802.Corrective actions:PER was
 initiated after unplanned start of reactor recirculation
 pump.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

March 10, 1998
GO2-98-052

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 50-397/97-13
RESPONSE TO NOTICE OF VIOLATION**

Reference: Letter dated February 9, 1998, AT Howell (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/97-13"

The purpose of this letter is to provide a response to the notice of violation outlined in the reference regarding failure to identify and fully implement corrective actions. The notice of violation resulted from an inspection which took place at the WNP-2 facility from July 15, 1997 through August 2, 1997. The Supply System's response to the notice of violation is enclosed as Attachment A.

The Supply System accepts this violation and agrees that our activities were not conducted in full compliance with NRC regulations. We are particularly concerned with the ineffective implementation of corrective action evidenced by the incomplete required reading.

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

Respectfully,


PR Bernis

Vice President, Nuclear Operations
Mail Drop PE23

Attachment

cc: EW Merschoff - NRC-RIV
KE Perkins, Jr. - NRC-RIV, WCFO
C Poslusny, Jr. - NRC-NRR

NRC Sr. Resident Inspector - 927N
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Q PDR



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RESPONSE TO NOTICE OF VIOLATION IN NRC INSPECTION REPORT 50-397/97-13

Attachment A

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VIOLATION 50-397/9713-01

The Supply System accepts this violation

Restatement of Violation

10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall ensure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above:

1. During the period of July 24, 1996, through August 1, 1997, a corrective action for a condition adverse to quality was not corrected. Specifically, the required reading for operators to assure that they would not take the fire water system out of service for a nonfire protection activity, while only a single source of fire water was available, was not completed for one operator.
2. In December 1995, measures did not assure that corrective actions were taken for a significant condition adverse to quality to preclude recurrence of a failure of the motor-pump coupling on the ac standby circulating lubricating oil pump for Emergency Diesel Generator DG2 on February 18, 1996. The corrective actions developed as the result of multiple motor-pump coupling failures that occurred since before 1991 were not fully implemented. Specifically, increased alignment checks, the installation of flexible hoses, and replacing the coupling with a different design coupling that was better suited to the operating conditions for the pump were not fully implemented.
3. On June 10, 1996, measures did not assure that corrective actions were taken for conditions adverse to quality to promptly identify and correct problems involving the inadvertent start of a reactor recirculation pump by operations personnel.

The is a Severity Level IV violation (Supplement 1). (50-397/9713-01)

Reason for Violation

The three examples described above can be characterized as either failure to promptly identify a condition adverse to quality or failure to fully implement corrective actions in a timely manner. The reason for these failures is that management expectations regarding timely identification and completion of corrective actions for conditions adverse to quality were not properly enforced. In addition, inadequate work management methods contributed to the untimely implementation of corrective actions.

RESPONSE TO NOTICE OF VIOLATION IN NRC INSPECTION REPORT 50-397/97-13

Attachment A
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Corrective Actions Taken and Results Achieved

A PER was initiated after the unplanned start of the reactor recirculation pump. It was determined that the pump start was caused by a faulty Input/Output module interface between the system controller and the pump. This component was replaced and successfully retested.

Required reading described in item 1 was completed on July 22, 1997, completing the corrective action for Notice Of Violation 50-397/95-18-01.

As a result of failures of motor to pump couplings on the AC standby lubricating oil pump the coupling spiders were replaced with stronger couplings. Additionally, acceptance criteria for the alignment procedure have been made more conservative. The couplings have been replaced and are on a schedule for replacement and realignment on a biennial frequency. These actions will ensure a higher degree of reliability. The final corrective action to mitigate vibration problems with the AC standby lubricating oil pump is the installation of flex hoses to facilitate performing the alignments. The necessity of this activity is being re-evaluated due to the expected effectiveness of the corrective actions already implemented.

Corrective Actions That Will be Taken to Avoid Further Violations

A corrective action has been initiated to communicate management expectations regarding extension allowances for corrective action due dates. This action will require a closer evaluation of the effect of due date extensions on problem recurrence and approval from a higher level of management for multiple extensions of corrective action due dates. It is expected that this corrective action will have a significant positive impact on timely completion of actions to correct conditions adverse to quality.

Date of Compliance

WNP-2 is in full compliance with the requirements of 10 CFR 50, Appendix B, Criterion XVI due to the corrective actions described above and adequate procedural guidance regarding identification of conditions adverse to quality and timely implementation of corrective actions.