

CATEGORY 1

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SUBJECT: Responds to NRC 980331 ltr re violations noted in insp rept
 50-397/98-03. Corrective actions: an amend request will be
 submitted to remove standby gas treatment sys from TS 5.5.2.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 29, 1998
GO2-98-080

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 98-03, RESPONSE
TO NOTICE OF VIOLATION**

Reference: Letter dated March 31, 1998, HJ Wong (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/98-03 and Notice of Violation"

The Supply System's response to Violations C and D of 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 Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
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NRC INSPECTION REPORT 98-03, RESPONSE TO NOTICE OF VIOLATION

Attachment A

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VIOLATION C

Restatement of Violation

WNP-2 Technical Specification 5.5.2, "Primary Coolant Sources Outside Containment," requires both periodic visual inspections and biennial integrated leakage inspections to be implemented for, in part, the containment monitoring, process sampling, and standby gas treatment systems.

WNP-2 Technical Specification 5.4.1.e requires procedures to be established, implemented, and maintained for all programs specified in Technical Specification 5.5.

Contrary to the above, as of March 14, 1998, Plant Procedure Manual (PPM) 1.5.6, Revision 8, "Leakage Surveillance and Prevention Program," the licensee's procedure for implementing the program under Technical Specification 5.5.2, was incomplete. Specifically, the procedure failed to identify the periodic visual inspection requirements for the standby gas treatment and process sampling systems. Additionally, the procedure failed to identify all of the appropriate components to be evaluated for leakage in the containment monitoring, process sampling, and standby gas treatment systems.

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

Response to Violation C

The Supply System accepts the violation.

Reason for Violation C

The Supply System agrees with the characterization of the violation given in the Notice of Violation. The procedures implementing the requirements of Technical Specification 5.5.2 contained deficiencies in addressing the specified testing for the containment monitoring system (CMS), the post accident sampling system (PASS), and the standby gas treatment system (SGT).

The SGT system was not part of the original license basis commitment for implementation of NUREG 0737, section III, D.1.1. However, the SGT system was included in the original issue of Technical Specification 5.5.2 (i.e., original Technical Specification 6.8.4.a). A note was subsequently added to PPM 1.5.6 exempting that system from inspection under the TS 5.5.2 program. This was an inadequate method of resolving the discrepancy between Technical Specifications and other licensing basis documents.

The PASS and CMS systems were included in PPM 1.5.6, but in the case of PASS, no plant procedure was identified for the periodic visual inspection, and the list of components to be checked for leakage were incomplete for both systems.

NRC INSPECTION REPORT 98-03, RESPONSE TO NOTICE OF VIOLATION

Attachment A

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Corrective Actions Taken and Results Achieved

System Engineering has reviewed the systems listed in Technical Specification 5.5.2 to ensure the applicable components within those systems are addressed in the testing procedures for biennial leakage inspections, and that procedures for periodic visual checks are adequate. The procedure revisions resulting from that review have been completed.

PPM 1.5.6 has been revised to include the containment monitoring, process sampling, and standby gas treatment systems, and to incorporate changes recommended by the System Engineering review.

Corrective Steps That Will Be Taken to Avoid Further Violations

An Amendment Request will be submitted to remove the standby gas treatment system from Technical Specification 5.5.2.

Date of Full Compliance

Full compliance was achieved on April 28, 1998 when procedures implementing the inspections required by Technical Specification 5.5.2 were revised.

VIOLATION D

Restatement of Violation

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, and deviations, are promptly identified and corrected.

Contrary to the above, from December 4, 1997, to March 6, 1998, the licensee failed to take prompt and adequate corrective action for a condition adverse to quality. Specifically, on December 4, 1997, the NRC identified procedural noncompliances in the control of transient combustibles in high radiation areas of the reactor building and the licensee failed to promptly and adequately address personnel knowledge deficiencies in implementing the transient combustible control program. As a result, additional procedural noncompliances in the control of transient combustibles in the reactor building were identified on February 18 and March 6, 1998.

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

Response to Violation D

The Supply System accepts the violation.

NRC INSPECTION REPORT 98-03, RESPONSE TO NOTICE OF VIOLATION

Attachment A

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Reason for Violation D

The Supply System agrees with the characterization of the violation given in the Notice of Violation and associated Report Details.

The reason for the violation was lack of understanding of the fire protection requirements and inattentiveness to fire protection labeling on the part of plant personnel. Additionally, prompt action was not taken to correct these knowledge deficiencies as a result of the problems identified on December 4, 1997.

Corrective Actions Taken and Results Achieved

Briefings were conducted with plant personnel who perform work in the plant focusing on the requirements of the transient combustible control program. The Operations department conducted these briefings for each operations crew.

Additionally, in preparation for the present refueling outage, a communiqué reiterating the need to comply with the plant procedure for control of transient combustibles, and containing expanded definitions of flammable and combustible materials, was communicated to employees who perform work in the plant.

Corrective Steps That Will Be Taken to Avoid Further Violations

The plant procedure for control of transient combustibles will be revised to include enhancements, and plant employees will be trained on the updated procedure by September 1, 1998.

Date of Full Compliance

Full compliance was achieved on April 10, 1998 when corrective action was taken to communicate relevant particulars of the transient combustible control program to plant employees.

