

CATEGORY 1

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SUBJECT: Responds to NRC 980408 ltr re violations noted in insp rept
 50-397/98-04. Corrective actions: revision to SWP-ASU-01 to
 require radiochemist be assigned to effluent audits.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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May 6, 1998
GO2-98-081

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 98-04, RESPONSE TO NOTICE OF
VIOLATION**


Reference: Letter dated April 8, 1998, B Murray (NRC) to JV Parrish (SS), "NRC Inspection
Report 50-397/98-04"

The Supply System's response to the Notice Of Violation, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, is enclosed as Attachment A.

Additionally, as requested in the cover letter to Inspection Report 98-04, we confirm the regulatory commitment to review the effects on collection efficiency caused by the relocation of the main vent particulate and iodine sampler. The response is enclosed as Attachment B.

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

Respectfully,


A. E. Mouncer
Acting Vice President, Operations Support
Mail Drop PE08

Attachments

cc: EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC WCFO
C Poslunsy, Jr. - NRR
J Lieberman - NRR

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

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PDR ADOCK 05000397
G PDR

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RESTATEMENT OF VIOLATION

10 CFR Part 50, Appendix B, Criterion XVIII, requires a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program. The audits shall be performed in accordance with the written procedure or checklists by appropriately trained personnel not having responsibility in the areas being audited.

Quality Assurance Procedure QAP-7, "Personnel Indoctrination, Training, Qualification, and Certification," Revision 6, states, "Personnel selected for quality assurance auditing assignments shall have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited."

Contrary to the above, personnel reviewing the radiological effluent monitoring program as part of the 1997 Quality Assurance Audit 297-073 did not have experience or training in the special nature of the activities audited. Specifically, the auditors did not have chemistry sampling and analysis experience or training dealing with the Offsite Dose Calculation Manual requirements.

This is a Severity Level IV violation (Supplement 1) (50-397/9804-03).

RESPONSE TO VIOLATION

The Supply System denies this violation because the WNP-2 licensing basis contains no specific requirement that an effluent audit team include a radiochemist.

In conducting NRC inspection 50-397/98-04, the NRC compared a 1996 audit which included the Offsite Dose Calculation Manual (ODCM) as well as the Radiological Environmental Monitoring Program (REMP) and Radiological Effluent Monitoring Program to the 1997 audit of only the REMP and Radiological Effluent Monitoring Program. After a review of procedures and audit scope of the 1997 Quality Assurance Audit 297-073, the Supply System believes the requirements in Quality Assurance Procedure QAP-7, "Personnel Indoctrination, Training, Qualification, and Certification," Revision 6 were met.

The audit was performed in accordance with the written procedures and checklists. Personnel selected to perform the effluent monitoring portion of the audit had the experience and training commensurate with the scope, complexity, and nature of the activities to be audited. Subsequent to receipt of the inspection report, an evaluation of the qualifications of the individuals assigned to the checklist questions, for effluent monitoring activities was performed. This comparison verified that appropriately trained and qualified individuals had been assigned.

The checklist questions were focused on activities such as ensuring written procedures or instructions were in place and reflected base requirements, and that problem trending was performed and corrective actions identified.

The auditor evaluated performance based activities on a limited scope due to scheduling restraints that provided only a few opportunities to make these type of assessments. Those that were performed did not include activities that would require a specific knowledge of chemistry, radiochemistry or offsite dose calculations.

The Supply System conducted this audit to include both the REMP as well as the Radiological Effluent Monitoring Program but was not scoped to satisfy the 24 month ODCM audit. A qualified radiochemist was assigned to this joint team with the primary responsibility to assess activities in the REMP portion of the audit. However, this individual performed informal reviews of the overall audit plan, checklist questions, and final report including the effluent monitoring portion. He attended all team meetings where audit activities and concerns were discussed. These team meetings are designed to serve as an information sharing forum and allow for expertise and knowledge of individual team members to be used as a resource by the entire team.

Although it is the Supply System position that the procedure requirements were met, the quality and scope of the audit did not meet with management expectations. The basis for including radiochemistry experience on effluents audits can be traced to Regulatory Guide 4.15. WNP-2 does not currently have a licensing basis position on Regulatory Guide 4.15. However, Quality Management believes it is appropriate to include a person with experience in radiochemistry and monitoring techniques on REMP and radiological effluents monitoring program audits in the future.

To address concerns with the scope of the 1997 audit, Quality Management has directed that the audit be reopened to include performance based observations of selected chemistry activities associated with radiological effluents. The increased scope will include counting room quality control, process monitor calibrations, sample collection and analysis, and laboratory equipment functional checks and calibrations. The expanded audit will be completed by May 7, 1998 and will include a qualified radiochemist on the team.

The following additional actions will be taken to address management concerns:

1. Revision to SWP-ASU-01 to require a radiochemist be assigned to effluent audits. If both audits are performed at the same time, one radiochemist would be sufficient to provide technical expertise. If these audits are performed independently, a radiochemist will participate in each audit.
2. Review of WNP-2 required audits to determine if any additional audits need supplementing with subject matter experts.
3. Establishment of a WNP-2 licensing basis position statement on Regulatory Guide 4.15.

CONFIRMATION OF REGULATORY COMMITMENT

RESTATEMENT OF REGULATORY COMMITMENT

It is our understanding that during the exit briefing on March 19, 1998, Mr. R. Webring, Vice President of Operations Support, stated Washington Public Power Supply System would review the effects on collection efficiency caused by the relocation of the main vent particulate and iodine samplers.

RESPONSE TO REGULATORY COMMITMENT

The Supply System agrees that this commitment was made.

The design change for the Reactor Building Process Radiation Monitoring System did not include a calculation for the particulate plateout that may result from additional sample line lengths. In addition, the preparation, verification and review process did not identify a need for a particulate plateout calculation and the Design Input List failed to identify the requirements of ANSI N13.1.

An initial operability assessment determined that the scope of the specific modification was small, and therefore the impact, if any on the correction factor would not reduce the ability of the system to collect a representative sample.

CORRECTIVE ACTIONS TO BE TAKEN

Planned corrective actions include:

1. Preparation of a sample line particulate plateout calculation for Reactor Building Process Radiation Monitoring System gaseous effluent sample line using the methodology presented in ANSI N13.1. To be completed by 8/15/98.
2. Incorporation of calculation(s) generated into PPM 12.11.1a "Radiological Effluent Calculations - Gaseous." To be completed by 8/20/98.

DATE OF FULL IMPLEMENTATION

All actions will be completed by 8/20/98.