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SUBJECT: Forwards response to violations noted in insp rept  
50-397/98-09. Corrective actions: briefing conducted with  
mechanical shop personnel on event, stressing need to review  
& comply w/all procedural prerequisites.

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July 30, 1998  
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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 98-09, RESPONSE  
TO NOTICE OF VIOLATION

Reference: Letter dated July 2, 1998, HJ Wong (NRC) to JV Parrish (SS), "NRC Inspection  
Report 50-397/98-09 and Notice of Violation"

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

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

Respectfully,



PR Bemis  
Vice President, Nuclear Operations  
Mail Drop PE23

Attachment

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# NRC INSPECTION REPORT 98-09, RESPONSE TO NOTICE OF VIOLATION

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## VIOLATION A

### Restatement of Violation A

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

Appendix A to Regulatory Guide 1.33 recommends, in part, written procedures for reactor disassembly and refueling.

Plant Procedure 10.3.21, Revision 3, "Reactor Pressure Vessel Disassembly," requires heavy load and critical lift movements to be controlled in accordance with Procedure 10.4.12, Revision 9, "Crane, Hoist, Lifting Device and Rigging Program Control."

Plant Procedure 10.4.12 requires temperature on the refueling floor to be greater than 64F prior to lifting loads of greater than 50 tons with the reactor building overhead crane. If minimum temperature requirements cannot be satisfied, the procedure requires contacting the rigging system engineer.

Contrary to the above, on April 17, 1998, prior to removing the reactor cavity shield blocks, each weighing approximately 100 tons, the licensee failed to ensure that refueling floor temperature was greater than 64 F and failed to contact the rigging system engineer. A local temperature monitoring device was unavailable on the refueling floor.

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

### Response to Violation A

The Supply System accepts the violation.

### Reason for Violation A

The Supply System agrees with the statement of Violation, and with the description of this event given in the Report Details.

The reason for the violation was determined to be inadequate procedure usage by the personnel involved in the activity. The procedure being used for vessel disassembly, PPM 10.3.21, includes a precautionary step directing the user to follow the controls set forth in PPM 10.4.12 for lifting of heavy components. PPM 10.4.12 was not referred to by the personnel involved, and therefore they were unaware of the applicable temperature limitations.

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### Corrective Actions Taken and Results Achieved

A briefing was conducted with mechanical shop personnel on this event, stressing the need to review and comply with all procedural prerequisites, precautions and limitations.

Additionally, a procedure enhancement has been made to include the applicable temperature limitations from PPM 10.3.21 into PPM 10.4.12.

### Corrective Steps That Will Be Taken to Avoid Further Violations

All corrective actions relating to this violation have been completed.

### Date of Full Compliance

Full compliance was achieved on April 17, 1998 when the applicable temperature limitations were verified.

## VIOLATION B

### Restatement of Violation B

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

Contrary to the above, on April 23, 1998, the licensee failed to take prompt and adequate corrective action for a condition adverse to quality. Specifically, on April 23, 1998, when the licensee found that an Asea Brown Boveri fuel assembly (WAC076) was not fully inserted in its spent fuel pool storage location (A10), the licensee failed to identify operability concerns with regards to the spent fuel criticality analysis, as described in the WNP-2 Final Safety Analysis Report. For criticality safety the analysis assumes that the Asea Brown Boveri fuel assemblies are fully inserted into their fuel storage locations.

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 statement of Violation, and with the description of this event given in the Report Details.

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The cause for the failure to identify statements in the FSAR relating to the assumptions of the criticality analysis was a lack of a questioning attitude on the part of the personnel involved in resolving the problem of the raised bundle.

### Corrective Actions Taken and Results Achieved

An analysis was performed to assure the raised bundle had no effect on the criticality analysis.

Engineering personnel involved in the resolution of the raised bundle issue were counseled concerning the need to review the FSAR for the plant licensing basis when dealing with emergent problems.

### Corrective Steps That Will Be Taken to Avoid Further Violations

All corrective actions relating to this violation have been completed.

### Date of Full Compliance

Full compliance was achieved on April 24, 1998 when the analysis was completed to assure the raised bundle had no effect on the WNP-2 criticality analysis.

## VIOLATION C

### Restatement of Violation C

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

Appendix A to Regulatory Guide 1.33 recommends, in part, written procedures for the performance of surveillances required by Technical Specifications.

Plant Procedure ISP-EFC-B108, Revision O, "Excess Flow Check Valve Test of Containment Atmosphere And Suppression Pool Level Instrument Sensing Lines," and Plant Procedure ISP-EFC-B102, Revision 1, "Testing Excess Flow Check Valves For Main Steam Leakage Control," provide procedural guidance for implementing, in part, Technical Specification Surveillance Requirement 3.6.1.3.8.

Contrary to the above, between May 19 and 26, 1998, the licensee failed to properly implement procedural requirements for testing excess flow check valves in that:

1. While performing Plant Procedure ISP-EFC-B108, technicians failed to isolate reactor protection system pressure Switch RPS-PS-4, in accordance with Steps 7.8.8 and 7.8.9, resulting in an unexpected half scram;

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2. While performing Plant Procedure ISP-EFC-B102, technicians failed to perform independent verifications when locating drain manifold Valves 42 and 50, in accordance with Steps 7.3.18 and 7.3.16, respectively.

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 statement of Violation, and with the description of this event given in the Report Details.

Example 1 - Performance of the subject procedure requires the coordinated participation of two field teams of I&C technicians and a technician in the control room. Each field team had a separate copy of the procedure and were performing required steps at their respective locations. Each team had a designated person in charge who was communicating with the control room technician, however, no single individual was in charge of the evolution to coordinate the various functions being performed. As a result, procedure steps to isolate Reactor Protection System pressure switches were inadvertently bypassed, resulting in the unplanned half scram during subsequent steps of the procedure.

Example 2 - During performance of the subject procedure I&C technician responsible for manipulation of instrument manifold valves failed to ensure an independent verification was performed prior to manipulation of the valves as required. Also, a second technician involved in the activity was not documenting the progress of the surveillance on his copy of the procedure.

In both the above instances, management expectations for the conduct of surveillance testing were not met.

### Corrective Actions Taken and Results Achieved

The consequences of this event were reviewed with the involved supervision and craft personnel emphasizing the need for command and control of work evolutions, the need for placekeeping during procedure performance, and the requirement to perform independent verifications where indicated in procedures.

### Corrective Steps That Will Be Taken to Avoid Further Violations

A classroom discussion will be conducted for I&C technicians emphasizing the need for command and control of evolutions which require more than three technicians.

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A training module will be prepared and implemented for I&C technicians for excess flow check valve testing which includes review of instrument/valve connections, system drawings, and excess flow check valve backfill cart operation.

### Date of Full Compliance

Full compliance was achieved on May 26, 1998 when the last of the subject procedures was successfully completed.

### VIOLATION D

#### Restatement of Violation D

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

Appendix A to Regulatory Guide 1.33 recommends, in part, written procedures for the performance of surveillances required by Technical Specifications.

Plant Procedure ISP-EFC-B103, Revision 0, "Excess Flow Check Valves Testing of Jet Pump, Reactor Pressure Vessel Drain and Core Plate Flow," and Procedure ISP-EFC-B102, Revision 1, "Testing Excess Flow Check Valves For Main Steam Leakage Control," provide procedural guidance for implementing, in part, Technical Specification Surveillance Requirement 3.6.1.3.8.

Contrary to the above, procedures for performing testing on excess flow check valves to satisfy Technical Specification Surveillance Requirement 3.6.1.3.8 were inadequate in that:

1. The demineralized water supply, defined by Plant Procedure ISP-EFC-B102 to be utilized for testing of excess flow check Valve PI-EFC-X18B, will not provide the required pressure for the test;
2. Procedure ISP-EFC-B103 fails to provide adequate instructions for backfilling instrument lines associated with excess flow check Valves PI-EFC-X44Be and PI-EFC-X44Bl. As a result, an improper lineup was established to a common instrument line which resulted in Division I and Division III EFS actuations.

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

#### Response to Violation D

The Supply System accepts the violation.

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### Reason for Violation D

- The Supply System agrees with the statement of Violation, and with the description of this event given in the Report Details.

Example 1 - During the performance of the subject procedure, an air-operated pressure increasing pump was used to augment the pressure supplied by the demineralized water system to test excess-flow check valves. Use of this pump was understood to be an accepted practice for this activity however, this practice was not proceduralized.

Example 2 - The procedure used for this activity, although factually correct, was vague concerning the exact identity and sequence of the valves to be manipulated for backfilling. This work activity had previously been performed by a dedicated team of technicians familiar with the details of the activity, and for which the existing procedural direction was adequate.

The cause of this event was a failure of supervision and technicians to meet management's procedure usage expectations. When uncertainties exist as to how to proceed with a work activity, the expectation is that work should be stopped and not continued until the clear direction has been established. Contributing causes were omission of relevant information in the procedure, and the technicians were not experienced in the performance of the task.

### Corrective Actions Taken and Results Achieved

The consequences of this event were reviewed with the involved supervision and craft personnel emphasizing the expectation that when a procedure deficiency is encountered, all work should be stopped and the procedure corrected before work is continued.

### Corrective Steps That Will Be Taken to Avoid Further Violations

All excess flow check valve testing procedures will be reviewed and revised if necessary to include enough specific instruction to perform the intended task without additional actions or in-field determinations of component identity or location.

A training module will be prepared and implemented for I&C technicians for excess flow check valve testing which includes review of instrument/valve connections, system drawings, and excess flow check valve backfill cart operation.

### Date of Full Compliance

Full compliance was achieved on June 2, 1998 when the last of the subject procedures was successfully performed.

### VIOLATION E

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### VIOLATION E

#### Restatement of Violation E

10 CFR 50.54(q) permits licensees to make emergency plan changes without prior Commission approval only if the changes do not decrease the effectiveness of the plan and the plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to Part 50.

Contrary to the above, on April 3, 1997, the licensee made a change to its emergency plan, without prior NRC approval, that decreased the effectiveness of the plan. Specifically, the change reduced the level of health physics expertise on-shift and overburdened the on-shift chemistry technician with health physics responsibilities.

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

#### Response to Violation E

The Supply System accepts the violation.

#### Reason for Violation E

The Supply System agrees with the statement of Violation, and with the description of this event given in the Report Details.

The 10 CFR 50.54(q) analysis of revision 19 of the WNP-2 Emergency Plan did not include evaluation of the responsibilities and duties which may be required of the on-shift chemistry technicians during the first 60 minutes of an emergency.

#### Corrective Actions Taken and Results Achieved

The WNP-2 Emergency Plan has been revised to require three health physics technicians on shift as required by NUREG-0654.

Plant procedures have been revised to require three health physics technicians on shift at all times.

This issue, and the related 10 CFR 50.54(q) analysis for revision 19 of the WNP-2 Emergency Plan, has been discussed with the Emergency Planning staff.

#### Corrective Steps That Will Be Taken to Avoid Further Violations

Revise PPM 1.3.43, Attachment 6.5, "Emergency Plan Evaluation Guidance" to include guidance on submitting emergency plan changes to the NRC for pre-approval that indicate any literal reduction of effectiveness regardless of justification.

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Date of Full Compliance

Full compliance was achieved on April 16, 1998 when in response to this concern, the plant was staffed with three health physics technicians.