

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Forwards response to violations noted in insp rept
50-397/98-14. Corrective actions: individuals involved in
emergency plan rev process counseled re need to ensure
emergency plan meets requirements of 10CFR50 App E.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 27, 1998
GO2-98-154

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 98-14, RESPONSE TO
NOTICE OF VIOLATION

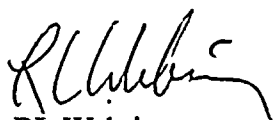
Reference: Letter, dated July 31, 1998, B Murray (NRC) to JV Parrish (SS), "NRC Inspection
Report 50-397/98-14 and Notice of Violation"

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 our response to the performance weakness identified during walk-throughs in the simulator 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,



RL Webring
Vice President, Operations Support/PIO
Mail Drop PE08

Attachments

cc: EW Merschoff - NRC RIV
DF Kirsch - NRC RIV, WCFO
C Poslusny, Jr. - NRR

NRC Sr. Resident Inspector - 927N
DL Williams - BPA/1399
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INSPECTION REPORT 50-397/98-14 RESPONSE TO NOTICE OF VIOLATION

Appendix A
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RESTATEMENT OF VIOLATION

10 CFR 50.54(q) requires licensees to follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Part 50, Appendix E. 10 CFR 50.54 also permits licensees to make changes to emergency plans without prior Commission approval only if the changes do not decrease the effectiveness of the plan.

Appendix E, Paragraph IV.F.1, requires that emergency plans include a description of specialized initial training and periodic retraining programs provided to certain categories of emergency personnel including directors; personnel who perform accident assessment, radiological monitoring teams, etc.

Contrary to the above, on July 13, 1998, the licensee made changes to its emergency plan, without Commission approval, that decreased the effectiveness of the emergency plan. Specifically, initial training requirements were reduced from formal classroom instruction, written examination, and hands-on training where appropriate to formal classroom instruction, written examination, or hands-on training.

And, on July 1998, it was determined that the licensee's emergency plan did not describe the initial and retraining programs. The emergency plan stated that course assignments for members of the emergency organization may be found in emergency plan implementing procedures. The course assignments were not found in implementing procedures, and retraining courses were only identified in a computer database.

This is a Severity Level IV violation (Supplement VIII) (50-397/98-14-01)

RESPONSE TO VIOLATION

The Supply System accepts the violation.

REASONS FOR VIOLATION

The Supply System agrees with the staff's characterization of the reason for this event given in the Report Details section of Inspection Report 50-397/98-14.

The root cause was determined to be a work practice issue. Specifically, changes to the Emergency Plan were made that changed an "and" statement to an "or" statement concerning the description of the initial emergency training program requirements for essential personnel. Although the actual training was not changed, this could lead to a misunderstanding of the requirements by future users of the Emergency Plan.

INSPECTION REPORT 50-397/98-14 RESPONSE TO NOTICE OF VIOLATION

Appendix A Page 2 of 2

The change was made in an attempt to clarify the wording in the Emergency Plan. The "or" statement implies that Emergency Preparedness (EP) initial training could consist of only hands-on training with performance evaluation. The change inadvertently created an alternative to formal classroom training with written examinations. The intent was to change the "and" to a stand alone statement and indicate that hands on training with performance evaluation sign off by an instructor could be used, where appropriate, in addition to required formal classroom training. It was also intended to mean that a performance evaluation could be used rather than a written examination to determine mastery of a task.

The lack of a detailed training program description in the Emergency Plan and corresponding procedures was identified in the inspection and resulted as a carryover of previous Emergency Plan revisions. Traditionally, the EP Training Course Catalog, and more recently, the Personnel Qualification Directory have been used to identify and track training qualification requirements for emergency response personnel. The brief description of the training program for emergency responders in the Emergency Plan had previously been deemed satisfactory as a program description. However, more detail is necessary to satisfy the requirements of 10 CFR 50 Appendix E.

A Problem Evaluation Request was initiated to address these issues.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Upon identification of the issue, the EP personnel involved in preparing and reviewing revision 20 of the Emergency Plan were counseled on the importance of providing thorough reviews and properly identifying changes that could reduce the effectiveness of the Emergency Plan.

In addition, individuals involved in the Emergency Plan revision process were counseled regarding the need to ensure the Emergency Plan meets the requirements of 10 CFR 50 Appendix E for content and level of detail.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FUTURE VIOLATIONS

The appropriate section of the Emergency Plan will be revised to remove the "or" statement and replace it with an "and" as originally written in revision 19.

In addition, the Emergency Plan revision will also include a more detailed training program description as required by 10 CFR 50 Appendix E.

DATE OF FULL COMPLIANCE

The revision to the Emergency Plan will be submitted for Plant Operations Committee and Plant General Manager approval by September 30, 1998.

RESPONSE TO INSPECTION FOLLOW-UP ITEM 50-397/98-14-02

Appendix B
Page 1 of 1

RESTATEMENT OF FOLLOW-UP ITEM

Crew performance during the walkthroughs [in the simulator] was mixed. The second crew observed was less rigorous in its use of Emergency Plan implementing procedures and did not perform correct dose calculations. A performance weakness was identified for failure of one of two crews to recognize that dose projections indicated a need for protective action recommendations beyond 10 miles.

RESPONSE TO FOLLOW-UP ITEM

The Supply System agrees with the characterization of the follow-up item and the need for corrective actions.

Immediate corrective actions were taken to counsel the Shift Manager and Shift Technical Advisor (STA) on the need to consider Protective Action Recommendations (PARs) beyond the 10 miles if Protective Action Guides (PAGs) could be exceeded. On July 23, 1998 additional dose projection training and evaluation was provided to the STA that had incorrectly performed dose calculations. In addition, a Problem Evaluation Request was initiated to address the issue.

CORRECTIVE ACTIONS TO BE TAKEN

Plant Procedure 13.2.2, *Determining Protective Action Recommendations*, will be revised to ensure evaluations are initiated to determine the need to notify offsite agencies of PARs beyond 10 miles if dose projections indicate PAGs at 10 miles may be exceeded.

In addition, during Operator Requalification Training, a review will be conducted of the PAGs and the need to consider PARs beyond 10 miles if the PAGs would be exceeded.

DATE OF FULL IMPLEMENTATION

Corrective actions will be completed by September 30, 1998.

Washington Public Power Supply System -3-

DISTRIBUTION w/copy of licensee's letter dated August 27, 1998:

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DRP Director

DRP Deputy Director

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