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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

March 16, 1999
GO2-99-053

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
RESPONSE TO NRC INSPECTION REPORT 50-397/98-24**

The subject inspection report addressed a concern with an observed generic weakness related to operator control board awareness. The NRC indicated that the issue, involving failure in monitoring key plant parameters and systems alignment status, had been a recurring theme since the March 1998 main steam isolation valve closure event. The NRC suggested that we review management expectations, training, and tools provided to the operators to strengthen this area. This letter provides a report of our actions to address this issue.

On the following occasions this weakness was observed:

- The crew had difficulty identifying automatic system realignment and monitoring key plant parameter indications during and following the March 11, 1998, main steam isolation valve closure event.
- The low pressure core spray (LPCS) minimum flow control valve was discovered out of its expected position by the NRC resident inspector (inspection report 98-13, dated July 7, 1998).
- Performance during an emergency exercise indicated a lack of awareness of increased moisture indication on one train of the standby gas treatment system.
- During an evaluated simulator scenario observed by the World Association of Nuclear Operators (WANO) in September 1998, the Supply System assigned a failing grade to a crew for inadequate monitoring and trending of a primary containment temperature during its approach to a predetermined limit.
- During the annual operating test observed by the NRC, the Supply System assigned a failing grade to a crew based on failure to take early remedial action to prevent exceeding a predetermined limit.

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RESPONSE TO NRC INSPECTION REPORT 50-397/98-24

Development of corrective actions to address some of these weaknesses began shortly after the March 11, 1998, MSIV isolation event. The first step was the development of the "Journey to Excellence" document by the Operations Manager. The purpose of the document is to identify areas needing improvement, assign responsibility for actions, and provide milestones for achievement. As performance issues are identified or areas of concern are brought to light, the document is revised and new actions are developed and assigned. These items are also tracked in the Plant Tracking Log (PTL).

The particular crew exhibiting inadequate performance during evaluated scenarios has developed specific short and long-term improvement actions. These actions are intended to focus the crew and supervision on their ability to remain alert to changing plant status and monitor and report changes to key plant indicators. Short-term remedial actions have been completed with the crew being successfully evaluated and returned to shift duties. Long term actions are in progress including practice for the crew and individuals and the performance of assessments throughout the 1999 training year.

Actions have been developed and are in progress to address all crews' performance in board awareness and other areas identified as needing improvement.

Training cycle 99-01 included presentation of new expectations and reinforcement of existing expectations for plant status awareness, critical parameter monitoring and trending, and identification of priority actions based on value and trends of specific indications. Each of the crews were coached on the expectations in practice scenarios during the training and formally assessed against compliance with those performance expectations. All crews exhibited improvement through the training week. The crews will continue to be coached on these skills during training cycle 99-02 and will again be specifically assessed against these standards during training cycle 99-03. A long term trending program has been developed to ensure reduced proficiency in this area is quickly identified.

During training cycle 99-01, the Operations Manager conducted classroom training with each operating crew reviewing the specific direction provided in PPM 1.3.1, "Operating Policies, Programs and Practices" and SOER 96-01, "Conservative Decision Making." During these presentations, the Operations Manager stressed his expectations for attention-to-detail, control board status awareness, and crew supervision's continuing role in on-shift coaching for improvement in operator performance.

Also mentioned in the NRC inspection report was the observed inconsistent quality of crew briefings being given by supervision during dynamic scenarios. This also is consistent with our findings. To address this, line supervisors recognized for excellent performance in this area have worked with Operations Training to create training tools (taped demonstrations) and lesson plans for presenting the expectations for quality crew briefings to each crew during training cycle 99-02. All crews will receive this training, will practice and be coached during training scenarios, and be formally assessed at the end of the week against compliance with the standards and expectations.

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The Supply System believes that basic skills such as these and other topics should be included as an integral part of scheduled operator training and is committed to ensuring that currently identified weaknesses are corrected aggressively and routinely monitored and trended to prevent recurrence.

Prior to September 1999, the Operations Department, with assistance from INPO, will conduct a self-evaluation to determine the effectiveness of corrective actions to date by evaluating crew performance trends in the plant and in the training environment. Operations will use the results to check and adjust actions taken and planned. Another Operations self-assessment is scheduled for November 1999 to once again gauge our progress towards improved performance.

The Operations and Training departments have been critically assessing Operator performance to identify areas for improvement. We have jointly identified corrective actions and are aggressively pursuing them. We believe that providing specific, focused training on accepted standards and expectations will result in improved crew and individual performance in the simulator and the plant control room.

Should you have any questions or desire additional information regarding this matter, please call W.S. Oxenford at (509) 377-8409, or P.M. Taylor at (509) 377-8274.

Respectfully,



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Vice President, Generation

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