

Washington Public Power Supply System  
A JOINT OPERATING AGENCY

P. O. Box 968 3000 GEO. WASHINGTON WAY RICHLAND, WASHINGTON 99352 PHONE (509) 371-1000

May 9, 1979  
G01-79-297



Nuclear Regulatory Commission  
Region V  
Suite 202, Walnut Creek Plaza  
1990 N. California Boulevard  
Walnut Creek, California 94596

Attention: Mr. G. S. Spencer, Chief  
Reactor Construction and  
Engineering Support Branch

Dear Mr. Spencer:

Subject: WPPSS Nuclear Projects Nos. 1/4  
NRC Inspection - WNP-1/4  
Dates of Inspection - February 12-16, 1979  
Docket Nos. 50-460 and 50-513  
Construction Permit Nos. CPPR - 134 and 174

Reference: Letter from G. S. Spencer to N. O. Strand, NRC Inspection  
WNP-1 & 4, dated April 3, 1979

This is in response to your letter which discussed the results of the  
February 12-16, 1979 inspection of activities authorized by NRC Construction  
Permits Nos. CPPR - 134 and 174.

The reference letter identified certain activities which were not conducted  
in full compliance with NRC requirements, as set forth in the Notice of  
Violation, enclosed as Appendix A. These items of noncompliance have been  
categorized into a level as described in your correspondence to all NRC  
licensees dated December 31, 1974.

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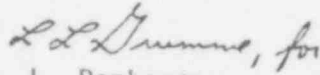
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The specific NRC findings, as stated in the reference letter and the Supply System responses are provided herewith as Appendix A. Also included are corrective actions taken to shorten the 10CFR 50.55 (e) process.

Very truly yours,

  
D. L. Renberger  
Assistant Director - Technology

DLR:TJH:am  
Attachment

cc: CR Bryant - BPA  
BD Redd - UE&C, Phil  
J. Freeman - UE&C, Phil

## APPENDIX A

Nuclear Regulatory Commission  
Region V  
Suite 202, Walnut Creek Plaza  
1990 N. California Boulevard  
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Docket Nos. 50-460 and 50-513  
Construction Permit Nos. CPPR - 134 and 174

### Notice of Violation

Based on the results of an NRC inspection conducted during the period of February 12-16, 1979, it appears that certain activities were not conducted in full compliance with NRC requirements as indicated below.

- A. 10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the quality assurance program documented in the PSAR and the WPPSS QA Program Manual procedure QAP-2, Paragraph 3.1, states in part that, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings."

UE&C procedure FGCP-35, "Field Change Notices - Initiation and Processing," in Paragraph 6.0, states that "Quality Assurance will review and approve FCNs that direct field design changes to Quality Class I activities."

Contrary to the above, Field Change Notice 257-1-79-028 issued on January 26, 1979, was not reviewed and approved by Quality Assurance. This FCN made changes to the diesel generator sole plates which were quality Class I items as defined by Specification 9779-53. This item is only applicable to UNP-1.

This is an infraction.

### Supply System Response

#### Action Taken to Correct the Identified Item

Field Change Notice 257-1-79-028 was revised on April 26, 1979 to reflect the correct Quality Class. Quality Assurance reviewed and approved the revised FCN on April 26, 1979

#### Action Taken to Preclude Recurrence

The Field Project Engineering Manager, on May 4, 1979, issued a directive to Field Project Engineers and Design Supervisors which requires a verification as to proper Quality Class of documents prior to issue.

Date of Full Compliance

Full compliance achieved May 4, 1979.

- B. 10CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the quality assurance program documented in the PSAR and the WPPSS QA Program Manual Procedure QAP-2, Paragraph 3.1, states in part that, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings."

Specification 9779-53, "Diesel Generators," in Paragraph 11.2, states that "All contractor's drawings submitted shall be posted with the WPPSS quality class as designated in these documents and as called for on the engineer's design drawings." Specification 9779-53 was defined as Quality Class I.

Contrary to the above, on February 14, 1979, ten contractor drawings furnished for installation of the diesel generators at WNP Units 1 and 4 were not posted with the WPPSS quality class designation. These drawings were located in the UE&C drawing control files.

This is a deficiency.

Supply System Response

Action Taken to Correct the Identified Item

The contractor has been advised that the majority of drawings submitted for the Diesel Generator do not indicate the WPPSS Quality Class as stipulated in Section 1A of Specification 9779-53. The contractor has been requested to resubmit those drawings which do not indicate the WPPSS Quality Class.

The Quality Class for the Diesel Generator is WPPSS Quality Class I.

Action Taken to Preclude Recurrence

The Field Project Engineering Manager on May 4, 1979 issued a directive to Field Project Engineers and Design Supervisors which requires a verification as to proper Quality Class of documents prior to issue. The directive also stated the importance of the WPPSS Quality Class to correctly note proper identification of equipment with respect to safety and operation of the Unit.

Date of Full Compliance

Full compliance achieved May 4, 1979.

- C. 10 CFR, Appendix B, Criterion IV, as implemented by Section 17.1.4 of the quality assurance program documented in the PSAR states that, "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services, whether purchased by the applicant or by its contractors or subcontractors."

Section 17.1.12 of the PSAR states in part, that, "WPPSS and UE&C generated procurement documents (shall) be reviewed and approved to verify that requirements have been included which provide for the development and implementation of measures to control measuring and test equipment." Certain requirements for these measures are listed in the PSAR which address calibration intervals, required accuracy, intended usage, calibration standards, environment controls, records of calibration history, removal from service, and investigation of previous inspection validity when test equipment is found to be out of calibration.

Contrary to the above, as of February 14, 1979, the contractor QA requirements delineated in Specifications 9779-211 and 257, WPPSS and UE&C generated and approved procurement documents, did not contain or reference the applicable requirements in the PSAR concerning the measures for controlling measuring and test equipment.

This is a deficiency.

#### Supply System Response

##### Action Taken to Correct the Identified Item

The contractor's procedure for Calibration and Control of Measurement and Test Equipment, POP-N-704W Rev. 1C, was revised on April 2, 1979 and returned "Approved as Noted" on April 19, 1979. Rev. 1D to procedure POP-N-704W was resubmitted April 27, 1979, and now addresses applicable requirements contained in the PSAR. Rev. 1D is currently undergoing in-house review.

##### Action Taken to Preclude Recurrence

Quality Assurance personnel have been informed of the necessity to cross reference PSAR and specification requirements during procedure review cycle.

Procurement documents will be revised to include reference to applicable requirements in the PSAR concerning measures for controlling measuring and test equipment.

Date of Full Compliance

Contract 211 and 257 procedure POP-N-704W has been reviewed by the Project QA organization and complies with PSAR and specification requirements. The procedure will be returned to the contractor by transmittal and placed in effect by May 21, 1979.

With respect to your concerns regarding reportability of nonconformances pursuant to 10CFR50.55(e), be advised that our procedure has been revised to increase our effectiveness in this area. QAP-11 Rev 2, dated March 31, 1979 delineates responsibility to the applicable WPPSS Project Engineering and Quality Assurance Managers to determine reportability and process reports under Part 21 and 10CFR50.55(e).

The recent report by the Supply System on the Letdown Cooler Supports will authenticate our increased effectivity in this area.