

**Washington Public Power Supply System**

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Docket No. 50-397

April 28, 1983

G02-83-393

Mr. D. M. Sternberg  
Chief, Reactor Projects  
Branch No. 1  
U.S. Nuclear Regulatory Commission  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2  
NRC INSPECTION 50-397/83-05 - NOTICE OF VIOLATION

Reference: Letter D.M. Sternberg to R.G. Matlock, dated March 29, 1983

Washington Public Power Supply System hereby replies to the Notice of Violation transmitted as Appendix A via the referenced letter. Our reply consists of this letter and Attachment 1 which contains our response to the Notice of Violation.

If you have any questions or desire further information, please contact Roger Johnson at (509) 377-2501, extension 2712.

  
C.S. Carlisle  
Program Director, WNP-2

GLC/kd

Attachment: Response to Notice of Violation

cc: W.S. Chin, BPA - Site  
A. Forrest, Burns and Roe - HAP0  
N.D. Lewis, EFSEC  
A. Toth, NRC Resident Inspector (917Q)  
Document Control Desk, NRC  
WNP-2 Files (917B/917Y)

8306170416 830613  
PDR ADOCK 05000397  
Q PDR

WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
NUCLEAR PROJECT NO. 2  
DOCKET NO. 50-397  
LICENSE NO. CPPR-93

NOTICE OF VIOLATION

Statement of Violation

As a result of the inspection conducted on February 1-28, 1983, and in accordance with the NRC Enforcement Policy, 10CFR Part 2, Appendix C, 47 FR 9887 (March 9, 1982), the following violation was identified:

Criterion XVII of 10CFR 50, Appendix B states, in part, that "Results of reviews, inspections, tests, audits, monitoring of work performance.. shall be identifiable and retrievable."

The WPPSS Procedure PMI-12-8, Revision 0, requires that "Collection, storage and maintenance of such QA records shall be in accordance with Reference 4.1 (ANSI 45.2.9-1974) and Regulatory Guide 1.88 as included in the FSAR." The ANSI N45.2.9, paragraph 3.2.1, requires that "the applicable design specifications...shall specify the quality assurance records to be generated by, supplied to, or held for the owner." In paragraph 6.1 it requires that "Storage systems shall provide for the accurate retrieval of information without undue delay." The Contract 24 design specification requires the manufacturer to provide records as follows:

- a. Section 15A, Part 3.8.2.3, requires test reports, including:  
(1) welder qualifications, (2) nondestructive test results, and  
(3) weld repair reports.
- b. Section 15A, Part 5.1, requires reports of all shop tests, including: (1) hydrostatic leak test and (2) magnetic tests of coatings.

Contrary to the above, on February 24, 1983, all of the above required records were not retrievable for each of the Class I diesel oil storage tanks, although the WPPSS responsible quality assurance reviewing organization had released the contract for final closeout on August 27, 1981.

This is a Severity Level V violation. (Supplement II)

Supply System Response

The Supply System reviewed the Contract 2808-24 record file to determine why the NRC Resident Inspector was unable to locate certain records. This review established that required records for the tanks were available within the file, however, some records were apparently mis-filed. It should be noted that retrievability of hard copy files involves reviewing the appropriate record index to determine record location. If a record is not associated with a specific documentation package, it may be located under a record category.

The Document Matrix noted in the details of the Inspection Report is a tool which Project QA uses to identify required quality records and is not of itself a QA Record. In the case of 2808-24 the matrix did indicate some records were missing, however, these records had been located and reviewed as indicated by Project QA signoff on the pre-microfilm checklist.

The Notice of Violation identified a number of specific records which could not be located. The resolution of these for each of the Class I storage tanks is as follows.

- (a) Coating Test Procedure - This test procedure was not submitted separately, but was included as part of the coating procedure and was found filed with the coating procedure.
- (b) Coating Test Report - This report was misfiled within the contract file, and has now been filed correctly.
- (c) Nondestructive Testing Results - Tank fabrication required visual inspection of welds and hydro testing, both of which were shown on the traveler. No other nondestructive tests were required.
- (d) Hydrotest Report - This report was misfiled within the contract file, and has now been located and filed correctly.
- (e) Welder Qualifications - These records were associated with more than one tank and were located within the contract file. These records have now been filed under the generic category of welder qualifications.
- (f) Cleanliness Report - This report was misfiled within the contract file, and has now been located and filed correctly.
- (g) Weld Repair Records - All weld repairs are shown on the traveler as were weld numbers U and V. A weld repair report was not required based on the following: The Specification states that ND 2539.6 will apply for weld repairs in lieu of paragraph 3.8 of Section 17A, and that radiographic inspection is not required. ND 2539.6 requires a weld repair report only when radiographic inspection is required.

#### Corrective Action To Preclude Repetition

No corrective action is planned. When hard copy records are microfilmed the indexing will be definitive enough to permit easier retrievability.

#### Date of Full Compliance

All actions are complete.