

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

May 10, 1984

Docket No. 50-397

Mr. Ross A. Scarano, Director
Division of Radiological Safety and Safeguards Programs
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION 84-07
MARCH 19-23, 1984

Reference: Letter, RA Scarano (NRC) to GC Sorensen (SS),
"NRC Inspection", dated April 18, 1984

Dear Mr. Scarano:

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in the appendix of your letter dated April 18, 1984. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A.

In Appendix A, the corrective steps which have been taken and the results achieved are outlined, the corrective actions taken to preclude recurrence are delineated, and the date when full compliance will be achieved is specified.

Immediately following the exit interview for the subject NRC Inspection, both WNP-2 Engineering and Plant Quality Assurance performed reviews of selected process monitoring systems and systems containing both Quality Class 1 and 2 equipment. The reviews were made to check the extent of quality class misidentification on working documents such as SDRs, SPRs, SWRs, MWRs and PEDs. Based on the results, it appears that the misidentification of quality class on the documents is prevalent only in System 36.0, Process Radiation Monitoring.

Mr. Ross A. Scarano
NRC Inspection March 19-23, 1984
Page 2
May 10, 1984

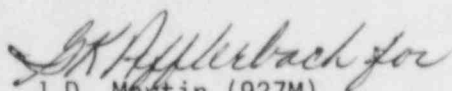
The referenced NRC letter states the violation involving downgrading of Quality Class 1 equipment is not an isolated incident and refers to Notice of Violation dated June 3, 1983 (NRC Inspection 83-14-02). We submit that the June 3, 1983 problem was associated with intentional downgrading of certain Quality Class 1 pipe supports. The current violation is unrelated to the June 3, 1983 event, in that quality class designation was a mistake and not intentional downgrading on the part of the Designer.

The referenced letter also expressed concern regarding the effectiveness of our independent technical reviews. We believe that the independent review conducted in December 1983 by Radiological Programs was effective. This review resulted in a total of 110 findings, fourteen of which delineated differences between installed systems and FSAR descriptions. These changes to the FSAR will be submitted with Amendment No. 35 in August 1984.

In formulating this response, we have considered the need for another independent review. In our judgement, and in light of actions already taken and others in progress, another independent review does not appear justified.

Should you have any questions concerning our response, please do not hesitate to contact me.

Very truly yours,


J.D. Martin (927M)
WNP-2 Plant Manager

Attachment

APPENDIX A

VALIDITY OF VIOLATION

The violation correctly identifies (1) that Burns and Roe Project Engineering Directive 218-I-B281 was issued in April of 1983 to relocate Quality Class 1 radiation detectors, (2) that the subject PED was incorrectly classified Quality Class 2, and (3) that the PED work sheets failed to identify drawing and FSAR revisions. This was in violation of project document control procedures. It should be noted that the detectors were installed to the outside of the ducting according to the PED and that the drawing (M812, Rev. 36) was incorrect and should have been revised.

CORRECTIVE STEPS TAKEN/RESULTS ACHIEVED

Specific

Quality Class 1 SPED-216-I-1272 has been issued to identify the drawing change and specify the Seismic I mounting detail. (PED-218-I-B281 affected only mounting; there was no revision to procurement specification or the system design function logic.) PED-216-I-1279 has been issued to clarify the bolting portion of the detector mounting.

SAR Change Notice 84-34 has been initiated to revise the FSAR Section 11.5, Process and Effluent Radiological Monitoring and Sampling Systems. Plant Modification Request 02-84-733 has been approved and implementation completed under Maintenance Work Request AY-5816.

Additional Actions

Burns and Roe performed a review of design mounting for the remaining Quality Class 1 detectors in the Process Radiation Monitoring System for similar errors in specifying quality class. None were found.

Supply System Quality Assurance reviewed the Test and Startup systems files for errors in Quality Class designation. Test and Startup originated documents and associated Project Engineering Directives for seven systems were checked. Systems reviewed included Reactor Recirculation, Reactor Water Cleanup, Leak Detection, Process Radiation Monitoring, Standby Gas Treatment, Area Radiation Monitoring and Process Sampling. No significant deficiencies or trends were found except in System 36 (Process Radiation Monitoring) where seventeen Startup documents and three PED's with improper Quality Class designation were identified. Identified deficiencies are being evaluated and resolved.

System 36 is notable in that Regulatory Guide 1.97 requirements for post accident monitoring changed significantly the number of components required to be qualified for Quality Class 1 post accident indication. Components that were originally designed/procured/installed as Quality Class 2 were upgraded by Equipment Qualification Group Evaluations. Upgraded equipment was replaced, or justified for interim operation (JIO) pending replacement or qualification in accordance with regulations.

The NRC Resident Inspector questioned the quality classification of several standby gas treatment fire protection deluge valves. Drawing M544, Revision 31, shows deluge valves SGT-DV-1A-1, -2 and -3 and SGT-DV-1B-1, -2 and -3 as Quality Class 1. However, the Fire Protection System is Quality Class 2. It was ascertained through 100% review of the fire protection system that these valves are correctly classified and that two Startup documents and one PED concerning these valves were misidentified as Quality Class 2. No additional problems were found. To complete our review, Plant Quality Assurance is reviewing Startup documentation of all Quality Class 1 equipment items that are scoped within Quality Class 2 system boundaries. Correction of misidentification problems will be addressed through the Plant Quality Program.

CORRECTIVE STEPS TO AVOID RECURRENCE

PED-218-I-B281 cited in the violation was issued in April 1983. Since that time, WNP-2 has gone operational and plant activities are now governed by the Plant Procedures Manual. The modification and design control aspects are accomplished according to PPM 1.4.1, Plant Modifications, and PPM 1.4.2, Plant Design Control Program. Under the latter PPM, the Supply System Technology Directorate is responsible for managing the design control program which embodies initiation and processing of PEDs. Since the issuance of the WNP-2 Plant Operating License on December 20, 1983, all of the engineers under the Assistant Director, Systems Engineering have been trained in the initiation and processing of PEDs, which includes the review for quality class as well as evaluation for an unreviewed safety question according to 10CFR50.59.

In addition, PEDs associated with PMRs are again reviewed by Plant Technical Staff Engineers who have been assigned to the various plant systems. By these reviews, misidentification of quality class as well as omission of required drawing revisions should be negated. An Engineering directive has been issued to reconfirm to all personnel that the Master Equipment List (MEL) shall be used to determine proper quality classification.

DATE OF FULL COMPLIANCE

Maintenance Work Request AY-5816, which implemented installation of the radiation monitors, was completed on May 2, 1984. FSAR Change Notice 84-34 reflecting locations of the radiation monitors will be submitted to the U.S. Nuclear Regulatory Commission in Amendment No. 35. This Amendment is scheduled for submittal in August 1984. The Engineering directive to reconfirm use of the MEL was issued May 11, 1984.