

Washington Public Power Supply System

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Docket No. 50-397
June 22, 1984

Mr. T. W. Bishop, Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: **NUCLEAR PLANT NO. 2**
LICENSE NO. NPF-21
NRC INSPECTION 84-11
APRIL 2-6, 1984

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in Appendix A of your letter dated May 22, 1984. Our reply pursuant to the provisions of Section 2.201, Title 10 Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, an explanation of the violation is presented, the corrective steps taken with results achieved are outlined, and the date of full compliance is specified.

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

J. D. Martin
J. D. Martin
WNP-2 Plant Manager

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Attachment

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APPENDIX A

Violation

As a result of an inspection conducted April 2-6, 1984, and in accordance with NRC Enforcement Policy, 10 CFR 2, Appendix C, the following violation was identified.

Technical specifications 6.5.1.6, Responsibilities states: "The POC shall be responsible for: . . . d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety. . . ."

Contrary to the above requirements the POC did not re-review changes made to a previously approved Plant Modification Record #02-84-0112-0, closed 3/22/84, relating to the installation of a temporary pressure switch (PS-21) in the RCIC system.

This is a Severity Level IV Violation.

Validity of Violation

The Violation correctly identifies Plant Modification Record (PMR) 02-84-0112-0 was not properly rereviewed by POC prior to closeout and it did not have a written determination that the change did not involve an unreviewed safety question.

PMR 02-84-0112-0 was initiated, POC reviewed, and Plant Manager approved to install a temporary pressure switch (RCIC-PS-21). The installation of the temporary pressure switch was necessitated by the unavailability of the permanent pressure switch in time to support Plant Operations. Prior to closeout of the PMR, the temporary pressure switch was determined to be acceptable by Supply System Design Engineering. Letters and Interoffice Memoranda documenting the overall acceptability of the installed switch, including seismic qualification and the fact that it was not required by Engineering requirements to be environmentally qualified were included in the PMR package. However, the PMR was not revised to show the permanent status of the installed pressure switch and rereviewed by POC prior to closeout. The Design Change Package (PED) associated with this modification was prepared prior to the inclusion in our design control program of the written determination (10CFR50.59 review) that an unreviewed safety question was not involved. The PED was implemented under our Plant Modification Program which does require a 10CFR50.59 review; therefore, a 10CFR50.59 review should have been included.

The operability of the RCIC system was not and is not in question as a result of this modification, but the requirements of Plant Modification Procedure PPM 1.4.1 were not properly followed. The failure to properly follow PPM 1.4.1 is judged to be caused by the individual preparing the PMR not being familiar with PPM 1.4.1. The unfamiliarity was due to the procedure becoming effective just following receipt of our operating license. This PMR was prepared very shortly after the procedure became effective.

Corrective Steps Taken/Results Achieved

- 1) The subject matter of this Violation and other deficiencies identified by the Supply System have been documented on a Plant Nonconformance Report which will track and document the completion of corrective actions.
- 2) A revision to the subject PMR has been initiated. The revised PMR will identify the installed pressure switch as a permanent modification and will be reviewed by the POC. The revised PMR will also include a written 10CFR50.59 review.
- 3) A 100 percent review of temporary modifications to date has been made to assess compliance with PPM 1.4.1. A total of three temporary modifications have been made including PMR 02-84-0112-0. The two other temporary modifications have not become permanent modifications. Both will be processed in accordance with PPM 1.4.1.

Corrective Steps to be Taken

- 1) Revise Plant Modification Procedure (PPM 1.4.1) to clarify instructions for implementing temporary modifications. The revised instructions will include direction on the proper methods of removing the temporary status of a temporary modification.
- 2) All personnel involved in processing temporary modifications will be made aware of this violation and the corrective actions.
- 3) Primary participants in processing temporary modifications will be provided training in the proper processing of temporary modifications after PPM 1.4.1 is revised. The importance of 10CFR50.59 reviews being included in PMR packages will also be stressed.

Date of Full Compliance

- 1) The revised and reapproved PMR is expected to be complete by 8/1/84.
- 2) The Plant Modification Procedure (PPM 1.4.1) is to be revised and issued by 8/1/84.
- 3) Notification of Plant Technical Engineers and POC members of this violation and the associated corrective actions is to be complete by 7/2/84.
- 4) Plant Technical Engineers and POC members will receive training on the revisions to PPM 1.4.1 by 9/1/84.