



MPPSS NUCLEAR PROJECT NO. 2 REPORTABLE DEFICIENCY AND CORRECTIVE ACTION PLANT ELECTRICAL SEPARATION

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

Description of Deficiency

To date the Plant Main Control Room has been reviewed and approximately 150 instances have been discovered involving violations in the application of WNP-2 Electrical Separation Criteria to safety related cables and panel wiring. In general, the deficiencies involved incorrect labeling, routing, termination, or power source of safety related cabling within PGCC or Control Room Panels. Examples of deficiencies found are as follows:

- Division 3 HPCS instrumentation powered from a Division 1 source;
- 2. Division 3 HPCS cables routed in Division 1 PGCC ducts and Division 1 cable trays in the cable spreading room.

Safety Implication

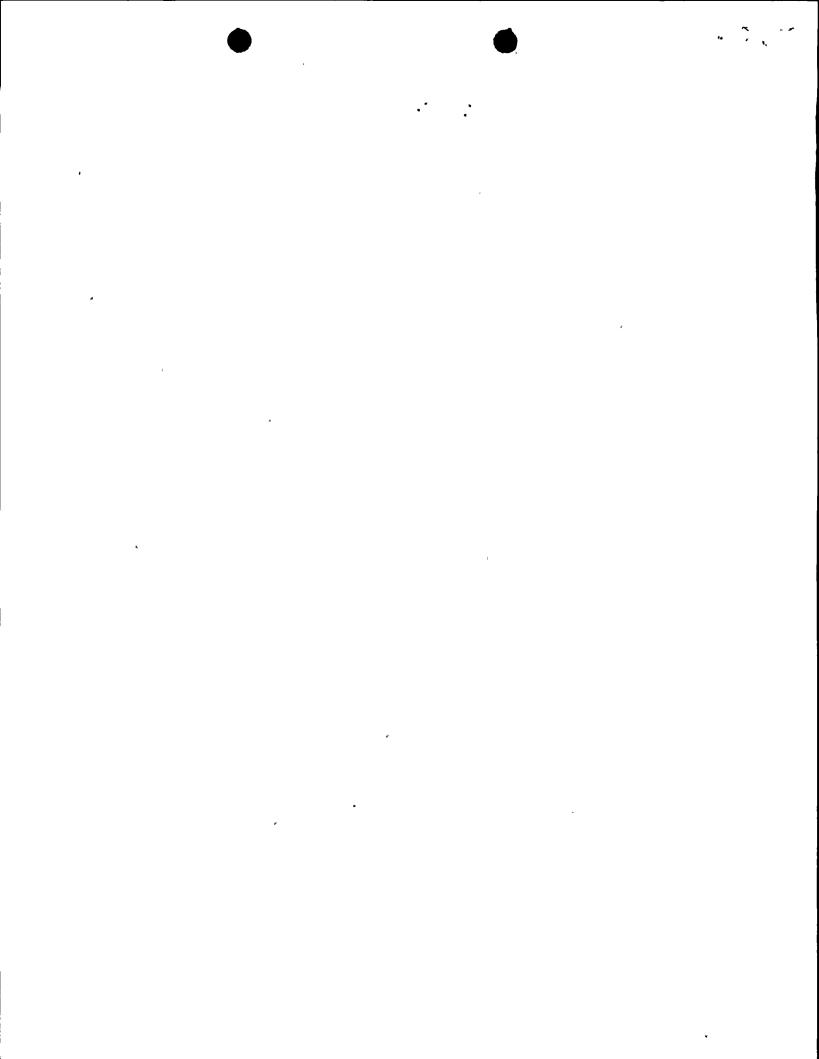
The deficiencies found to date could have resulted, under single failure conditions, in the simultaneous loss of redundant safety related equipment with possible subsequent loss of safety function.

Corrective Action

A task force is currently reviewing the Main Control Room and plant areas for other violations of WNP-2 Separation Criteria in all safety related applications.

The WNP-2 Separation Criteria has been refined and clarified and is being used by the Separation Task Force as criteria by which to judge plant separation as designed and installed. This same criteria will be submitted in an FSAR amendment. All instances of deficiencies identified as criteria violations will be evaluated and corrected via Project Engineering Directives (PED's) to the appropriate contractor.

The task force is working to an action plan which to date has resulted in the completion of the Main Control Room review and identification of deficiencies as described above. The remainder of the review which includes such things as MCC's, Local Panels, etc., is scheduled to be complete by October of 1979. Note that ongoing reviews will be conducted as warranted by construction completion.



ENCLOSURE 2

SEPARATION FIELD AUDIT

You are requested to perform a detailed field audit of installed electric equipment and systems to determine conformance to the criteria relating to the separation of electric equipment and systems to which you have committed in your FSAR, (e.g., Regulation Guide 1.75).

This audit should include a sample not less than 10% of the installed equipment and cables, and should emphasize, but not necessarily be limited to:

- a) Separation of redundant Class 1E equipment (e.g., motors, valve operators, instruments).
- b) Separation of redundant Class 1E cables.
- c) Separation of associated circuits.
- d) Identification (marking) of redundant Class 1E equipment and cables.
- e) Identification (marking) of associated circuits to a level indicative of the Class IE system with which they are associated.
- f) Separation of redundant wiring, indicators and controls at panels and control boards.

The audit should be performed by engineering and supporting technical personnel who understand the criteria, standards and guides relating to the separation of electric equipment and systems, and who were not involved in the design and installation of the equipment and systems under audit.

The results of this audit should be reported to NRC, with a discussion of any corrective actions taken and any additional audit to be conducted in the event numerous violations are uncovered.

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