

**Washington Public Power Supply System**

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REGION V 18E

Docket No. 50-397/85-36  
December 19, 1985

Mr. J.B. Martin, Regional Administrator  
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 REPORT 85-36

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated November 27, 1985. 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 our position regarding the validity of the violation, is provided. Should you have any questions concerning our response, please do not hesitate to contact me.



G.C. Sorensen  
Manager, Regulatory Programs

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During an NRC inspection conducted on September 28 - November 1, 1985, a violation of NRC requirements was identified. The following has been excerpted from the Notice of Violation:

Appendix B of 10CFR50, Criterion V requires, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, ... (which) shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

The WNP-2 Technical Specifications Section 6.8.1.a requires that procedures be established, implemented and maintained covering activities listed in Appendix A of Regulatory Guide 1.33 Revision 2, which includes procedures for performing maintenance and surveillance testing.

Contrary to the above requirements, it was determined on October 24, 1985, that WNP-2 plant surveillance procedures did not include instructions or criteria for determining that important activities are properly accomplished; i.e., that terminal box and junction box covers on environmentally qualified equipment are replaced or secured following maintenance or surveillance testing. As a consequence, environmentally qualified instruments were not maintained consistent with the program described in Section 3.11 of the FSAR and Section 4.2.7 of the "WNP-2 Environmental Qualification Report for Safety-Related Equipment."

#### VALIDITY OF VIOLATION

The Supply System acknowledges the validity of the violation. As noted in your inspection report, due to our prompt corrective action, we will not respond to the specific finding. It is sufficient to note that prompt interim and final corrective action is the goal of the Supply System.

Per your request, this reply will address:

- 1) evaluation as to why our staff failed to identify and correct this deficient condition over an extended period of time; and
- 2) corrective actions necessary to improve plant staff response to such matters in the future.

As you are aware, Equipment Qualification issues and jargon have been principally dealt with at the engineering/design level. As such, detailed information concerning all the equipment qualification requirements are not common knowledge of the "typical" plant worker. The Supply System, as have the nuclear industry, recognized the need to increase the awareness of plant staff to this important issue. This is not to say that our equipment qualifications "experts" should not have identified and corrected these situations. Rather, as design requirements are specified for a station, or the industry, we must do a better job in evaluating and communicating the requirements to the typical plant worker.

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CORRECTIVE ACTIONS TAKEN/RESULTS ACHIEVED

- 1) The plant has been inspected with any deficient conditions corrected.
- 2) The Plant Manager has directed his staff to conduct more frequent plant tours and to look for and correct deficient conditions.
- 3) Weekly meetings between the plant staff and the design engineering community are taking place. One of the purposes of these meetings is to ensure total integration of the equipment qualification requirements into our normal work process.
- 4) The Equipment Qualification Design Engineering Group has presented a program to Plant Management. This program dealt with the history, basic requirements and future issues in equipment qualification.

CORRECTIVE ACTIONS TO BE TAKEN

- 1) A training video tape on equipment qualification is being prepared. This is intended to educate principal plant workers on these requirements.
- 2) The Maintenance Shop Practices Manuals will be evaluated as to the need to provide specific direction concerning preservation of equipment qualification integrity.
- 3) A training bulletin will be issued by our Nuclear Safety Assurance Group. This will describe this event and our corrective action.

DATE OF FULL COMPLIANCE

- 1) The target date to complete the video tape and begin training is February 1, 1986.
- 2) The evaluation of the Maintenance Shop Practices Manual will be complete by February 1, 1986.
- 3) The training bulletin will be issued to Maintenance, Operations and Plant Engineering personnel by February 1, 1986.

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