

26 JUN 1987

Docket No.: 50-397

8707060111 870626
PDR ADDCK 05000397
Q PDR

DISTRIBUTION
Docket File
NRC & Local PDRs
JLee
PD5 Memo

MEMORANDUM FOR: Dennis Kirsch, Director
Division of Reactor Safety and Projects
Region V

THRU: George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

FROM: John O. Bradfute, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

SUBJECT: NRR SALP INPUT FOR WNP-2 AND THE SUPPLY SYSTEM FOR THE
REPORT PERIOD FROM FEBRUARY 1, 1986 THROUGH May 31, 1987.
(TAC# 65367)

The enclosed report provides NRR's input to the SALP Report for WNP-2, covering licensing activities from February 1, 1986 through July 31, 1987. The overall performance of the Supply System in the functional area of Licensing Activities is at a Category 2 level with a perceived improving trend.

Original signed by

John O. Bradfute, Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Enclosures:
As stated

- cc: T. E. Murley
- F. J. Miraglia
- D. M. Crutchfield
- G. M. Holahan
- G. W. Knighton
- R. B. Samworth
- J. O. Bradfute

CONTACT:
John O. Bradfute, NRR
X24679

DRSP/PD5
JOBradfute:cd
6/24/87

DRSP/PD5
RSamworth
6/24/87

DRSP/PD5
GWNighton
6/25/87

AD/DRSP
GMHolahan
6/25/87

D/DRSP
DMCrutchfield
6/26/87



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket No. 50-397

LICENSEE: Washington Public Power Supply System
FACILITY: WPPSS Nuclear Project No. 2
SUBJECT: NRR CONTRIBUTION TO SALP REPORT
EVALUATION PERIOD: 1 February 1986 through 31 May 1987

I. INTRODUCTION

A Systematic Assessment of Licensee Performance (SALP) is conducted periodically by the USNRC. This report presents the NRR contribution to the overall SALP review for WNP-2 and it addresses in detail the assessment of the functional area of "Licensing Activities". The other functional areas are also addressed from the NRR point of view for use in the detailed evaluations by region V which has responsibility for the final SALP report for WNP-2.

The assessment has been prepared generally in accordance with the SALP guidance package provided by memorandum from Region V dated 7 May 1987. The Region V memorandum incorporates the significant aspects of the NRC Manual Chapter 0516 as attachments.

II. CRITERIA AND SUMMARY

NRC Manual Chapter 0516 identifies six performance criteria with characteristic attributes. SALP performance ratings were provided with the work products prepared by the various NRR reviewers primarily in conjunction with the various licensing actions requested by the licensee. As specified in the Manual Chapter, each of the identified criteria was evaluated from several points of view and assigned a performance rating category (Category 1, 2 or 3) based on a subjectively evaluated composite of the characteristic attributes. These work products (mostly safety evaluations) and associated SALP ratings were formally transmitted to the Project Manager who combined this information with his own assessment of licensee performance and, applying judgmental weighting factors, arrived at an overall rating for the licensee.

Based on these ratings as indicated above, the overall performance rating for the Washington Public Power Supply System in the functional area of "Licensing Activities" is Category 2.

II. PERFORMANCE ANALYSIS

The evaluations of the licensee's performance were based on considerations of the attributes of the six criteria as given in the Region V Memorandum. For most of the licensing actions considered in these evaluations, only three of the criteria were of great significance. Therefore the composite or overall rating was heavily based on the following criteria:

- o Management Involvement in Assuring Safety
- o Approach to resolution of Technical issues from a safety Standpoint
- o Responsiveness to NRC Initiatives

Narrative assessments for each of the criteria are as follows:

1. Management Involvement and Control in Assuring Quality

WNP-2 undertook two fuel reloads during this rating period. The first was accomplished during the spring of 1986 and was managed and executed in an exemplary manner. The second occurred at the end of the current SALP period and appeared also to be handled in an excellent manner although some schedule delays in restarting were noted. Further the plant availability during the intervening period was high indicating an apparent high degree of management involvement in the operation of the plant. The continuing problems with both recirculating pumps over a two year period, however, is a cause for some concern. The receipt and installation of the improper gasket suggests a need for management's reexamination of the Supply System's Quality Assurance program.

Participation by the WNP-2 management in the licensing process was noticeably improved during this SALP rating period. During this period twenty-three licensing actions were completed and none was required nor requested on an exigent or emergency basis. This performance compares with thirteen Technical Specification amendments granted during the previous SALP rating period, seven of which were requested on an expedited basis. This performance reflects a substantially improved focus of attention by the WNP-2 management. Similarly the quality of the submittals has shown marked improvement.

The NRR staff suggests that the Supply System management generally reflects good control, significant involvement and consistent prior planning and assignment of priorities. It appears from ratings on

fire protection issues that the Supply System management does not regard the resolution of the staff's fire protection concerns with the same priority as other concerns. This area needs further improvement.

In summary, however, management involvement and control in assuring quality is rated as Category 1 for this rating period. The previous rating was Category 2 and an improving trend in performance is apparent.

2. Approach to resolution of Technical Issues from a Safety Standpoint

The Supply System's approach to the resolution of technical issues has generally been sound and viable. The NRR staff feels that the Supply System demonstrated a very good understanding of the technical aspects and functioning of their plant and a sensitivity to the safety issues which, for the most part, they addressed conscientiously and in compliance with the regulations. Although we must note that the Supply System has not performed in a like manner with respect to the considerable number of fire protection issues that surfaced during this SALP period. With that, the overall performance of the Supply System is regarded as satisfactory.

Based on this evaluation, the licensee's approach to the resolution of technical issues during this evaluation period is rated as Category 2. The previous rating was Category 1; consequently the trend appears to be decreasing and additional management involvement would seem warranted. It should be noted that the primary issue associated with the reduced rating relates to fire protection which is an ongoing issue in which the WNP-2 management (as well as the NRC) has demonstrated a significant interest. The apparent decreasing trend reflects concern that the numerous fire protection issues have not yet been resolved or closed.

3. Responsiveness to NRC Initiatives

The Supply System' responsiveness to NRC initiatives has been appropriate, timely and acceptable. The fire protection issues are perceived as the primary exceptions. An additional exception involves the licensee's responses to numerous attempts to resolve a relatively minor organizational detail presently governed by the Technical Specifications.

The licensee's responsiveness to NRC initiatives during this evaluation period is rated Category 2. This rating during the previous SALP period was also Category 2 and no trend is evident.

4. Enforcement History

The enforcement history during this evaluation period was evaluated from the total number of enforcement actions and the absence of violations above severity level IV. These observations suggest good performance in this attribute. A rating of Category 2 is supportable.

5. Operational and Construction Events

The reactor scram which occurred on March 22, 1987, and the subsequent recovery difficulties (LER 87-02) were of interest to NRR management. During recovery the reactor water level reached the elevation of the main steam line inlet three times over nearly a three hour period following the scram. This was the second steam line flooding event during the SALP interval (see also LER 86-25). NRR management was briefed on the event on May 12, and the ACRS was informed of the event on June 5, 1987. It was subsequently concluded that no NRR licensing action is needed.

The SALP rating should reflect the reporting of the event under 10 CFR 50.72. The problems experienced during recovery from the initial scram were not reported to the Operations Center and were therefore not known to those screening events for immediate follow up.

The rating for this attribute during this SALP period is Category 2.

6. Staffing (Including Management)

The Supply System's licensing staff, in its working relationship with the engineering and operations staff has a sound technical understanding of their system and its performance characteristics. Appropriate personnel are invariably in attendance at meetings and telephone conferences with the NRC staff so that conferences are generally short and productive.

On the other hand, NRR has recently become concerned about the licensee staff's implementation of the procedures for making changes to the licensing basis documents. In particular there seems to be a lack of appreciation of the need for timely filing of amendments to the FSAR in safety areas. An example is the case of correcting Amendment 37 concerning power being removed from valves RHR-V-8 and RHR-V-9 when we understood it had been decided not to operate in that mode. Apparently there was no plan to amend this unreviewed safety area until the annual FSAR update. Further, the licensee staff discussed changes to the technical specifications bases without obtaining NRR staff concurrence. It has been necessary to advise them that since the approved technical specifications reflect the "bases" such changes require staff concurrence.

The rating for this attribute during this SALP period is Category 2 which is reduced from the rating for the previous SALP period, Category 1, and the examples identified above, probably signal a decreasing trend.

IV. RECOMMENDATIONS

As the Supply System's performance in the area of Licensing Activities is mixed, recommendations are varied:

- o With respect to the management control of license amendment requests, the Supply System has shown remarkable improvement by the elimination of emergency technical specification changes during this SALP period. This improvement was encouraged in the previous SALP report and the licensee appears to have been responsive. Further encouragement may be in order but recognition and commendation for significant improvement in this area is appropriate.
- o With respect to the Supply System's use of the appropriate procedures for accomplishing modifications to their licensing basis documents, it is recommended that the Supply System should take measures to ensure that their licensing staff and operation management achieve a mutual understanding of the requirements for timely and accurate filing of FSAR amendments and for modifying other licensing basis documents according to the provisions of 10 CFR Part 50.

V. ASSESSMENT OF OTHER FUNCTIONAL AREAS

While the primary thrust of this evaluation is focused on licensing activities and the rating assignment pertains only to this functional area, some NRR observations relating to the other functional areas are included:

- o Plant Operations - There has been little NRR contact with the operating staff other than the plant manager and his assistant. Visits to the site have led to the conclusion that plant housekeeping has markedly improved during this SALP period and the observed control room operations seem to run smoothly and with decorum. We have no bases to conclude that the plant operations were not performed in an acceptable manner.
- o Radiological Control - The Supply System's Annual Personnel Monitoring Report indicated that the total collective dose for 1986 was 221.55 man-rems. This value is below the industry average and is well below the average for BWR plants. The Supply System should be commended.

- o Maintenance - Severe vibration problems with the two recirculating pumps have continued throughout virtually all of this SALP evaluation period. Although the root cause of this difficulty now appears to be a design deficiency, possibly aggravated by a quality assurance weakness, the possibility remains that poor maintenance may be contributing. It should be noted that the problem is not regarded by NRR as an immediate safety issue; nevertheless the chronic nature of the problem is cause for concern because it suggests that failure of both pumps could result in a safety issue or that safety related issues could be allowed to become chronic.
- o Surveillance - No specific NRR observations have been made and no difficulties have been brought to our attention except the seven LER's that resulted from personnel errors. Since defective procedures are themselves distinct causes for surveillance errors, perhaps this relatively large number should be cause for a somewhat modified emphasis of the training program.
- o Fire Protection - While the overall fire protection issue has absorbed an enormous fraction of attention by Region V, NRR and the Supply System almost from the beginning of this SALP period, we note that the issue has given rise to but one LER. We recommend a diligent and continuing effort by all three organizations to resolve the remaining issues promptly and effectively.
- o Emergency Preparedness - NRC Headquarters activated its Incident Response Center in support of Region V's Emergency Preparedness Drill in September 1986. No fault with the Supply System's participation was found by the Headquarters staff that participated.
- o Security - During several site visits by the Project Manager and other NRR personnel during this rating period, the Supply System's plant security system appeared to be designed and functioning quite well. The Security personnel appeared to be well trained and highly motivated.
- o Outages - Outages have been few but appeared by NRR to have been handled expeditiously and effectively by the Supply System when outage events have required it.
- o Quality Programs and Administrative Control Affecting Safety - Other than the observations and comments under "Maintenance" above, no observations have been made by NRR and no difficulties have been brought to our attention.

- o Training and Qualification Effectiveness - An audit of the Supply System's training program was conducted by NRR primarily to evaluate the INPO audit of the same area. The report of the NRR audit team indicated that the Supply System's training program was excellent and in some aspects could be considered a model for the industry.

VI. SIGNIFICANT OCCURRENCES

NRR/Licensee Meetings - Two significant meetings were convened in which both NRR and the Supply System personnel participated. Region V representatives participated in both.

- o Project Directorate 3 of the Division of BWR Licensing (previous organization) held a one day meeting in Bethesda with representatives of all utilities and all Project Managers associated with the Directorate. The meeting was held on 9 September 1986 and its purpose was to provide an opportunity for the utilities and the NRC to share concerns and discuss difficulties so as to improve the licensing climate within the Directorate. The meeting was marginally successful.
- o Fire Protection - On 14 January 1987 a meeting was held at the Supply System Headquarters in Richland as a preliminary information exchange prior to a combined inspection of the WNP-2 facility by Region V and NRR. The meeting was attended by many of the responsible managers from Region V, NRR and the Supply System. The subsequent inspections were intended to clarify the many fire protection issues that had been identified by Region V inspectors and NRR reviewers on numerous inspections and visits during the proceeding months. The meeting and subsequent inspections accomplished much of their intended purpose but left several fire protection issues open.

Commission Meetings - There was none

NRR Site Visits - Seven visits to the WNP-2 facility were made by NRR personnel during this SALP period. The dates of the visit are as follows:

6 - 7 Mar 1986*
20 - 21 Mar 1986
16 - 24 Jul 1986
12 - 13 Aug 1986*
12 - 16 Jan 1987*
17 - 20 Mar 1987
19 - 22 May 1987

Many of these visits were group visits and the three marked (*) were oriented toward the significant licensing issue of fire protection.

Schedular Extensions Granted - Two schedular exemptions were granted by license amendment during this SALP period. Amendment 23, dated 5 May 1986, extended the required schedule for implementing the upgrading of neutron flux measurement instrumentation to comply with Regulatory Guide 1.97 requirements. The schedular exemption extended the required implementation from restart following the first refueling outage to restart following the second refueling outage.

Amendment 25, dated 23 May 1986, extended the schedule for upgrading the Suppression Pool Level instrumentation in a similar manner.

Reliefs Granted - The following table shows the status of relief requests that were received or disposed of during the current SALP period:

<u>Date of Request</u>	<u>TAC Number</u>	<u>Relief Request</u>	<u>Disposition</u>	
28 Feb 85	57728	PSI Program Plan	granted	31 Jul 86
29 May 85	58034	IST Program Plan 7 requests	1 withdrawn 5 granted 1 denied	22 Jul 86 27 Mar 87 27 Mar 87
14 Jun 85	59295	ASME Section XI	not granted	6 Nov 86

Exemptions Granted - Two exemptions to the regulations were granted during this SALP period; both were exemptions from requirements of Appendix J.

Emergency Actions Granted - None was requested and none was granted.

License Amendments Issued - See Attachment 1.

Orders Issued - There was none.

Issues Pending - At the end of this SALP period there were thirty-three Licensing Actions under review and in progress. This number included five Multiplant Actions.

VII. CONCLUSIONS

Individual ratings for the six evaluation criteria for the functional area of Licensing Activities are tabulated below. The tabulation includes the previous SALP ratings and an indication of the perceived trend.

<u>Criterion</u>	<u>Previous SALP Rating</u>	<u>Current SALP Rating</u>	<u>Trend</u>
1. Management Involvement and Control in Assuring Quality	2	1	improving
2. Approach to Resolution of Technical Issues	1	2	-
3. Responsiveness to NRC Initiatives	2	2	-
4. Enforcement History	1	2	-
5. Operational and Construction Events	2	2	-
6. Staffing (Including Management)	1	2	down

The overall SALP performance rating for the Supply System in the functional area of "Licensing Activities" is Category 2.

License Amendments Issued
During SALP Period
February 1, 1987 and May 31, 1987

Amendment Number	TAC Number	Title	Date of Issuance
21	60546	Drywell Head "0" Surveillance	March 18, 1986
22	57546	Primary Containment Integrity	May 2, 1986
23	60415	Flux Monitoring	May 5, 1986
24	60548	Manual to Automatic FPC-U-149	May 13, 1986
25	61114	Wetwell Level Measurement	May 23, 1986
26	60953	Table 3.6.3-1	May 23, 1986
27	60952	Table 3.8.4.3-1	May 23, 1986
28	60804	Cycle 2 Reload	May 23, 1986
29	61482	Physical Security Plan	Oct. 16, 1986
30	59793	Vacuum Breakers Inoperable	Oct. 31, 1986
31	60050	Primary & Secondary Containment Integrity	Nov. 6, 1986
32	59500	Radioactive Effluent Monitoring	Nov. 6, 1986
33	59673	Composition of CNSRB	Dec. 2, 1986
34	62181	Turbine Overspeed Protection System	Dec. 11, 1986
35	60765	Pressure Temperature Limits	Dec. 17, 1986
36	61222	Chlorine Detection System Removal	Jan. 21, 1987
37	61116	H ₂ -O ₂ analyzers	March 27, 1987
38	62045	Safety/Relief Valve Setpoints	March 27, 1987
39	61641	Iodine Spiking	March 31, 1987
40	64217	Snubber Removal while in Modes 4&5	April 21, 1987
41	60740	Appendix J, Type B&C Leak Testing	April 29, 1987
42	63052	Containment Penetration Fuss	May 21, 1987
43	64358	SLCS Boron Concentration and Flow Rate	May 29, 1987

1987 SALP RATINGS

Attachment 2

TAC Nr	Title	Date	Reviewer	Ratings						Overall
				1-Manag	2-Tech	3-Resp	4-Staff	5-RE	6-Train	
	Control Room Ventilation	29 Apr 86	Hayes	1	1	1				1
56181	DCRDR	6 Nov 86	Serig	2	3	2				2
57545	Isolation Valve Surveillance	9 Jul 85	Eltawila*							
57546	Isolation Valve Exclusion	2 May 86	Lazevnick*							
57728	PSI Program Plan Relief	27 Mar 86	Turovlin		2	2				2
57805	MPA Item 2.1	19 Dec 86	Trehan		2			2		2
58034	ISI Program Plan & Relief	6 Feb 87	Turovlin		1	2				2
59031	Diesel Autostart	17 Dec 86	Rhow*							
59295	Use of Later ASME Code	16 Dec 86	Shaw*							
59500	Offgass Treatment Monitors	21 Feb 86	Fell	2	2					2
59673	CNSRB Composition	16 Jan 86	Allenspach*							
59793	Vacuum Breakers	1 Nov 85	Eltaawila		2					2
59798	Training Coordinators	13 Nov 86	Allenspach	2		3	2			2
59904	LPRM Calibration	1 May 86	Brooks*							
60050	Primary Containment Integrity	10 Apr 86	Witt	1	1	1				1
60345	Purge Time Limit	17 Mar 86	(no name)		2	2				2
60415	Flux Monitoring Upgrade	6 May 86	Lazevnick*							
60545	MOV Thermal Overload Protection	23 May 86	Rhow*							
60546	Drywell Head "O" Ring Surveillance	18 Feb 86	Zwetzig	1	2					1
60548	Manual to Automatic FPC-V-149	20 Feb 86	Zwetzig	3	2					3
60737	"Spray On" Coatings	17 Oct 86	Notley	2	2	3				3
60739	High Burn Up Fission Gas Release	15 May 86	Suh	2	2	2				2
60740	Type B & C Leak Testing	16 Mar 87	Guo	2	2	2				2
60765	Pressure/Temperature Limits	27 Mar 86	Litton*							
60804	Cycle 2 Reload	15 May 86	Richings	1	1	1				1
60915	Fire Protection	6 Nov 86	Ridgely	3	2	3				3
60952	Table 3.8.4.3-1	3 May 86	Rhow*							
60953	Table 3.6.3-2	May 86	Bradfute	1	1	1				1
61014	Ultimate Heat Sink	30 Apr 86	Ridgely	1	1	1				1
61114	Wetwell Level Measurements	6 May 86	Steven	1	1	1				1
61116	H2 - O2 Analyzers	7 Nov 86	Witt	1	1	1				1
61222	Chlorine Detectors Removal	15 Dec 85	Chu	2	1	1				2
61482	Physical Security Plan	5 May 86	Gaskins	1	1	1	1		1	1
61641	Iodine Spiking	25 Sep 86	Skopec	1	1	2				1
61850	Neutron Flux Monitoring	2 Dec 86	Rhow*							
62045	Setpoint Tolerances	13 Nov 86	Li*							
62181	Turbine Overspeed Protection	7 Oct 86	Tsao	2	2	2				2
62784	Fire Protection Concerns	9 Mar 87	Ridgely	3	3	3				3
63052	Primary Containment Overcurrent	13 Feb 87	Rhow		2					1
63935	TIP Nitrogen Line	10 Apr 87	Kim	2	1	1				1
64106	Turbine Missiles (LC 7)	24 Feb 87	Tsao	2	2	2				
64217	Snubbers	27 May 87	Shaw*							
64320	Cable Spreading Room	13 Feb 87	Notley*							
64595	Code Case N411	22 May 87	Wright*							
64987	Cycle 3 Reload	4 May 87	McCoy	1	1	1				1

1.70 1.64 1.77 1.50 2.00 1.00 1.71

*no SALP

Average of averages 1.602

Average of ratings 1.688