



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

Docket No. 50-397

July 17, 1987
G02-87-218

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 87-09

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 17, 1987. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendices A and B (attached).

In Appendix A, an explanation of our position regarding the validity of the violation is provided. Appendix B describes our plans to make post-trip review committees more effective in the determination of causative factors pertaining to events.

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

G. C. Sorensen
Manager, Regulatory Programs

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Enclosures

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APPENDIX A

During an NRC inspection conducted on April 1 - May 23, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A: 10 CFR 20.201(b) requires licensees to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. Section 6.8.1 of the Technical Specifications requires written procedures to be established and implemented for the Health Physics Program. Administrative Procedure 1.11.3, paragraph 1.11.3.5.B.8 states, "... All employees are required to follow the protection...". Paragraph 1.11.3.5.A.11, Radiation Work Permit (RWP), states, "The RWP is an administrative control with the primary function of identifying radiological hazards and prescribing protective measures for a particular task". RWP-2-87-00138, used to control work on the refueling bridge during the R-2 outage, required the operator to notify the Health Physicist prior to removal of equipment from the fuel pool.

Contrary to the above (1) an underwater light was removed from the fuel pool at approximately 8:30 a.m. on April 26, 1987, without a survey being made to detect radiation hazards that may have been present as it was being removed and (2) a television camera was removed from the fuel pool at approximately 2:00 p.m. on May 7, 1987, without the operators notifying the Health Physicist of its removal so a survey could have been made to detect radiation hazards that may have been present.

This is a Severity Level IV Violation (Supplement I).

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

1. The material was surveyed after removal and found to have an exposure rate less than 10 mR/hr. It was then bagged for contamination control.

Corrective Action to be Taken

1. Each RWP that is written for controlling work in the Fuel Pool area will continue to include the requirement that personnel notify Health Physics prior to removing material from the Fuel Pool. To reinforce the need for compliance with all radiological requirements, a letter will be issued from the Plant Manager to all station and contractor personnel. This letter will identify representative cases of non-compliance and discuss the role of all station personnel in ensuring radiological safety.

2. Technical Evaluation Request (TER) 87-0160 has been submitted to engineering to evaluate the feasibility of mounting an Area Radiation Monitor (ARM) on the refueling bridge. The addition of this monitor will augment the technician in ensuring the radiological acceptability of material being withdrawn.

Date of Full Compliance

Evaluating and/or mounting the ARM on the refueling bridge will be complete prior to the next refueling outage. If this cannot be accomplished by that time, a temporary ARM will be positioned in the area until such time that a permanent ARM can be installed. All other action to be complete prior to August 31, 1987.

- B. 10 CFR 50 Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings". Further, Section 5.2.1 of WNP-2's Operational Quality Assurance Program Description Manual, states, "Activities that affect safety-related functions of plant items shall be described by and accomplished through implementation of documented procedures, instructions or drawings as appropriate".
 1. Procedure No. 1.3.19, Housekeeping, paragraph 1.3.19.4.A.2.g, states in part that: "Gas bottles are not to be secured to safety-related equipment: such as, conduit, pipes, etc".

Contrary to the above, on April 26, 1987, 39 gas bottles were secured with a large rope to a safety-related cable tray support in the reactor building railroad bay.

This is a Severity Level IV violation (Supplement 1).

Validity of Violation

The Supply System acknowledges the validity of this violation.

The bottles cited in the violation had been replaced with fully-charged bottles and were awaiting transfer to the Warehouse. Due to truck traffic in the access bay during the RF87A refueling outage, the bottles were moved from a temporary on-the-floor horizontal position and inappropriately secured in an upright position.

Corrective Steps Taken/Results Achieved

On May 18, 1987, all empty bottles which were secured to the conduit and piping in the railroad bay, were removed and temporarily stored in a horizontal position on the floor. A temporary sign was placed on the south wall of the railroad bay, directing personnel to store empty bottles on the floor and a directive was also placed in the Radwaste Control Room's standing orders to that effect.

Corrective Action To Be Taken

Plant Procedure 1.3.1, "Standing Orders/Night Orders," will be revised (by means of a procedure deviation) to stipulate Operations personnel responsibility for surveillance and disposition of CIA and CSP nitrogen bottles. Except for temporary placement of capped bottles in a horizontal position during renewal activities, bottles will not be stored outside the seismic storage racks.

Date of Full Compliance

Corrective action will be completed by July 31, 1987.

2. Technical Specifications 6.11.1 states that,

"Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure." Paragraph 11.2.24.1.5.B.2a of Plant Procedure 11.2.24.1 requires a weekly source check of CAMs (Continuous Air Monitors) for those units in service.

Contrary to the above, a weekly source check had not been performed on CAM AM-3 RB4A in use on the 606 foot elevation on the Reactor Building refueling deck from April 13 to April 26, 1987, at a time when reactor refueling operations were in progress.

This is a Severity Level V violation (Supplement 1).

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

1. A source check was performed after the required date and the unit was found to be functioning properly.
2. The management process, whereby source checks are evaluated, has been reviewed and determined to be adequate.

Corrective Action to be Taken

1. The importance of procedural compliance will be re-emphasized to the Health Physics Technicians.
2. A letter will be issued from the Health Physics/Chemistry Manager to the Health Physics Staff that details recent NRC Notices of Violation and the causes/corrective actions. This letter will also stress the need to comply with procedures.

Date of Full Compliance

Corrective Action will be complete prior to August 31, 1987.



APPENDIX B

On July 6, 1987 the Supply System received a Confirmatory Action Letter from the Nuclear Regulatory Commission (Region V) which addressed several items relating to the performance of an assessment of plant readiness prior to restart. Included in those items was an evaluation of the effectiveness of the Supply System post-trip review and root cause assessment programs.

In response to the letter, Supply System personnel are currently in the process of reviewing the post-trip review and root cause assessment programs. At the completion of the review a supplemental response to this part of NRC Inspection Report 50-397/87-09 will be submitted to advise the NRC of our plans to make post-trip review committees more effective in the determination of causative factors pertaining to events.

It is expected that the supplemental response will be provided by September 1, 1987.

