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FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 871021 ltr re violations noted in Insp Rept 50-397/87-26. Corrective actions: on 870901, util submitted request for amend to Tech Specs (Table 3.3.2-2) to raise main steam tunnel temp trip setpoint from 150 F to 164 F.

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November 17, 1987
G02-87-273

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 87-26

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated October 21, 1987. 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, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

JDA/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA
NRC Site Inspector - 901A

IE01
1/1

APPENDIX A

During an NRC inspection conducted on August 31 - September 30, 1987 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1987), the violations are listed below:

A. Technical Specification 3.3.2 states in part that:

> "The isolation actuation channels...Main Steam Line Tunnel Temperature-High...shall be OPERABLE with their trip setpoints set consistent with the values...less than or equal 150 degrees F".

Contrary to the above, on August 3, 1987, surveillance procedure PPM 7.4.3.2.1.60 was performed which set the Main Steam Line Tunnel Temperature-High setpoints for channels "A", "B", "C", and "D" to a value of 156F.

This is a Severity Level IV Violation (Supplement 1)

Validity of Violation

The Supply System acknowledges the validity of this violation in that the Main Steam Tunnel Leak Detection instrumentation was calibrated to a value higher than the Technical Specification Trip Setpoint without prior NRC approval. However, it should be noted that the decision to calibrate the MSL Tunnel instruments to the allowable limit was based on our interpretation of the Technical Specification Bases (Section 3/4.3.2). It is stated in the Bases that, "Operation with a trip set less conservative than its Trip Setpoint but within its specified allowable value is acceptable on the basis that the difference between each trip setpoint and the allowable value is equal to or less than the drift allowance assumed for each trip in the safety analysis."

This interpretation of the Bases statement is considered to be a programmatic concern and, as a result, our corrective actions address not only the Main Steam Tunnel instrument setpoint problem but other program problems associated with this issue as well.

Corrective Steps Taken/Results Achieved

1. On September 1, 1987 the Supply System submitted a request for amendment to the Technical Specifications (Table 3.3.2-2) to raise the Main Steam Tunnel Temperature Trip Setpoint from 150°F to 164°F. This value accounts for drift, total loop inaccuracy and calibration error providing a 21 degree margin to the analytical limit. The six degree margin to the Allowable Value accounts for the maximum expected instrumentation drift between required calibration frequencies of 18 months.

2. On September 8, 1987 the Supply System received NRC approval of a Temporary Waiver Request to allow the raising of the Main Steam Tunnel Temperature Trip Setpoint from 150°F to 156°F. The Temporary Waiver is effective for 90 days.

3. A memo was issued providing direction to Plant personnel that Technical Specification instrumentation is to be set at or conservative to the Technical Specification Trip Setpoint.

4. Each trip instrument associated with Technical Specification Trip Setpoints was identified and the associated Master Data Sheets were reviewed to identify tolerances which could result in calibration as-left values between the Trip Setpoint and the Technical Specification Allowable Value. Because several such instances were identifed, every applicable surveillance procedure performed since the granting of the Operating License was reviewed to determine if a calibration value left between the Trip Setpoint and the Allowable Value contributed to exceeding a Technical Specification Allowable Limit.

   From the surveillance procedure review it was determined that approximately 8976 tests have been performed on instrumentation verifying the instrument setpoint. The results of that review are as follows:

   - 0.5% (45) of the tests found instruments with setpoints outside the Allowable Value. Of these, 21 (0.2%) tests found instruments with setpoints outside the Allowable Value where the setpoint was left on a previous calibration at a value between the Trip Setpoint and Allowable Value.

Corrective Action to be Taken

1. Plant Procedures which govern the Instrument Program will be modified to assure that setpoints are set equal or conservative to the Technical Specification Limits.

2. All Surveillance Calibration Procedures and Instrument Master Data Sheets associated with Technical Specification instruments will be revised to require instruments to be set equal to or conservative to the Technical Specification Trip Setpoint.

3. An administrative limit, conservative to the Technical Specification Allowable Value, has been established between the Trip Setpoint and the Allowable Value such that the potential for exceeding an Allowable Value is minimized by requiring the recalibration of the instrument when the Trip Setpoint drifts to the Administrative Limit between required calibration frequencies. To attain added data for performance trending, the as-found values are recorded when channel functional testing is performed. This action affords instrument drift information at intervals more frequent than Technical Specification calibration requirements.

Date of Full Compliance

Although the Supply System is currently in full compliance, further corrective action will be completed by September 30, 1988.

B. Technical Specification 6.12.2 states that:

> "Areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrems shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the health physics supervision."

Contrary to the above, on September 9, 1987 keys controlling access to areas in the Reactor Building with radiation levels such that a major portion of an individual's body could receive a dose greater than 1000 mrems in 1 hour, were left unattended for about 15 minutes in the Reactor Building. All doors affected were subsequently determined by the licensee to be properly locked.

This is a Severity Level V Violation (Supplement 1)

Validity of Violation

The Supply system acknowledges the validity of the violation.

Corrective Steps Taken/Results Achieved

1. All affected doors were verified to be properly locked.

2. Based on the estimated time the keys were unattended, and their location when retrieved, it was reasonably concluded that the keys had not been used for an unauthorized entry.

3. The individual the keys had been logged to was counseled by Health Physics supervision regarding his responsibilities for Plant access keys that are in his custody.

4. A letter has been issued from the Plant Manager to all Plant personnel detailing this Violation and reinforcing the responsibilities of individuals regarding key control.

Corrective Action to be Taken

1. This event has been reviewed for broader applicability and it is concluded that Plant procedures are not sufficiently detailed on the topic of key control in that personal responsibility is not clearly defined. Accordingly, Plant Procedure (PPM) 1.7.1, "Access Key Control", will be revised to more precisely describe Supply System expectations for access key control. The revision will include references to key control for radiological and security access keys.

2. PPM 11.2.7.3, "Entry Into and Egress From High Radiation Areas", will be revised to include instructions on access key control for High Radiation Areas provided with access control locks.

Date of Full Compliance

Revisions to PPM 1.7.1, "Access Key Control", and PPM 11.2.7.3, "Entry Into and Egress From High Radiation Areas", will be issued prior to February 1, 1988.