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 AUTH. NAME      AUTHOR AFFILIATION  
 CHAFFEE, A.E.      Region 5, Ofc of the Director  
 RECIPIENT AFFILIATION  
 RECIP. NAME      RECIPIENT AFFILIATION  
 SORENSON, G.C.      Washington Public Power Supply System

SUBJECT: Ack receipt of 881221 ltr informing NRC of steps taken to correct violations noted in Insp Rept 50-397/88-24.

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Docket No. 50-397

Washington Public Power Supply System  
P. O. Box 968  
3000 George Washington Way  
Richland, Washington 99352

Attention: Mr. G. C. Sorenson  
Manager of Regulatory Programs

Gentlemen:

Thank you for your letter of December 21, 1988, in response to our Notice of Violation and Inspection Report No. 50-397/88-24, dated November 23, 1988.

Your reply denied that Violations A and B occurred as stated, and acknowledged Violations C and D. We have reviewed your response to Violations A and B and have reached the following conclusions. Regarding Violation A, your reply states that prior to deviating from Surveillance Procedure 7.4.4.3.1.4, your technicians received permission from the Shift Manager and the I&C Maintenance Supervisor to do so, and the Shift Manager concluded that the work should continue without the deviation first being documented. Based on this information, and discussions held between our inspection staff and your staff, we have concluded that the violation was not valid and it is therefore withdrawn. We note that this information was not provided to our inspection team prior to the conclusion of the inspection although ample time was available.

Additionally, we remain concerned that your administrative procedures readily allow deviations from procedures based solely on verbal discussions by your plant staff. We consider this manner of conducting plant evolutions to be very undesirable because experience has shown that verbal exchanges of information alone frequently result in misunderstandings and errors. Our review of the appropriateness of this practice is continuing. With regard to the situation addressed by the violation, we fail to understand why the Shift Manager concluded that the work must continue without first documenting the procedural deviation.

Regarding Violation B, we have concluded that the violation is valid. Our understanding remains that the RPS actuation on May 29, 1988, was not specifically anticipated by the ARI Pre-Operational Test Procedure and therefore the actuation was not part of a planned operational procedure or test. We do not consider an undocumented advance recognition by your staff that an actuation could occur to constitute the operation of an engineered safety feature as part of a planned procedure or test.

Similarly, regarding the August 26, 1988 RPS actuation, the actuation was not anticipated by a planned test or procedure, but was rather considered a possibility by your staff. Therefore this event was reportable. We refer you to the Commission's Statement of Consideration for Section 50.72(b)(2)(ii), which states: "Operation of an ESF as part of a planned test or operational

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evolution need not be reported. However, if during the test or evolution the ESF actuates in a way that is not part of the planned procedure, that actuation should be reported." 48 Fed. Reg. 39039 (Aug. 29, 1983) (Emphasis added). Also, NUREG 1022, Supplement 1, addresses this matter. Specifically, questions 6.6 and 6.7 make clear that the actuation must be anticipated by a documented procedure or test.

We request that you again respond to Violation B in writing within 30 days of the date of this letter. With regard to Violation A, please provide a written discussion describing the manner in which the Supply System ensures that verbally approved deviations from procedures are only used under appropriate circumstances and in such a manner that the possibility of errors or misunderstandings is minimized. Also, please describe the circumstances surrounding the work on the Drywell Sump Flow monitor which supported continuing the work via a verbal procedural deviation.

With regard to your corrective actions for Violations C and D, those actions will be verified during a future inspection.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

*Original Signed*

A. E. Chaffee, Acting Director  
Division of Reactor Safety  
and Projects

cc:

C. M. Powers, WNP-2 Plant Manager  
A. G. Hosler, WNP-2 Licensing Manager  
G. D. Bouchey, Director Assurance & Licensing  
G. E. Doupe, Esq., WPPSS A./Lee Oxsen, Assistant Managing Director for  
Operations, MD/1023  
State of WA  
N. S. Reynolds, Esq., Bishop, Cook, Purcell & Reynolds

Corrective Action to be Taken

The I&C Supervisor and/or Engineer will be counseled as to their responsibility per PPM 1.5.4 and the timeliness of any required corrective action. The procedure, PPM 1.5.4, will be revised to include time limits for review and corrective actions on all out-of-calibration measuring and test equipment. Also, the procedure is void on the tracking of these deficiencies. A tracking mechanism will be incorporated in this revision to the procedure.

All supervisors will be reminded of their need to take prompt action in helping resolve outstanding deficiencies of measuring and test equipment.

Date of Full Compliance:

February 1, 1989.



- C. Technical Specification 6.8.1 states, in part, that "Written procedures shall be established, implemented, and maintained covering ... the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978." These include "Procedures for Performing Maintenance".

Paragraph E of Administrative Procedure 1.3.9, Revision 9, "Control of Electrical and Mechanical Jumpers and Lifted Leads," states in part that any deviations to the determination/retermination data sheet following Shift Manager approval shall be reauthorized by the Shift Manager.

Contrary to the above, each of the "determination/retermination" sheets associated with completed maintenance work requests MWR-A-0110 (troubleshooting blown fuses on the power supply to solenoid pilot valves for MS-V22A-D) and MWR-AU9257 (repair of leaking valve RHR-V53-B) contained a cable which had been determined but not reterminated. The changes to the work instruction had not been authorized by the Shift Manager.

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

#### Validity of Violation

The Supply System acknowledges the validity of the violation relative to the incompleteness of data sheets.

Changes to the work scope require Shift Manager approval. However, changes to the work instructions do not require authorization from the Shift Manager provided the work scope is not changed.

Successful operability tests demonstrated the cables with undocumented retermination had been properly reterminated. This indicates that the scope of work had not been changed, but that checkoff and verification had not been documented on the data sheets.

#### Corrective Steps Taken/Results Achieved

Training was performed on 10-21-88 on PPM 1.3.9, Control of Electrical and Mechanical Jumpers and Lifted Leads, emphasizing Determ/Reterm requirements.

#### Corrective Action to be Taken

The procedures and Determ/Reterm Data Sheet in PPM 1.3.9 will be revised to provide more overview that will reduce the probability of documentation omissions.

#### Date of Full Compliance

Revise PPM 1.3.9 prior to R-4 outage, expected to begin during April 1989.

- D. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action", requires measures to be established to assure that conditions adverse to quality, such as defective equipment and nonconformances, are promptly identified and corrected.

Contrary to the above as of September 2, 1988, two torque wrenches and one leak rate monitoring instrument had been identified 12-18 months prior to the inspection as being out of calibration, but an evaluation of the impact of this lack of calibration had not been performed.

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

Validity of Violation

The Supply System agrees with the violation in that the resolution corrective action was not taken in a timely manner.

Corrective Steps Taken/Results Achieved

A review was completed of the Plant installed equipment that was calibrated and torqued using the three pieces of M&TE in question. The results were as follows:

- o Torque Wrench #39433
  - Corrective Action - None
  - Any work performed utilizing this torque wrench had been redone under later work packages prior to the discovery of this violation.
- o Torque Wrench #43121
  - Corrective Action - None
  - A review of the MWRs utilizing this torque wrench indicated the bolting was QC-II non-pressure boundary or that it was a temporary installaton (AV1144, Spool Piece).
- o Leak Rate Monitor #27221
  - Corrective Action - None
  - The calibration error was in the conservative direction, i.e., indicated leakage higher than the actual leakage. On all plant equipment the monitor was used during the period of out-of-calibration, the total leakage indications for each were well below the allowable limits.

The review revealed that recalibration and/or retorquing was not necessary and the disposition was closed. If the review would have revealed a recalibration was needed, an NCR/PDR would have been generated and appropriate action taken.



bcc w/copy of letter dated 12/21/88:

Docket File  
Resident Inspector  
Project Inspector  
G. Cook  
A. Johnson  
B. Faulkenberry  
J. Martin  
LFMB

bcc w/o copy of letter dated 12/21/88:

M. Smith

<i>for</i>	<i>for</i>	<i>SAR</i>	<i>MA</i>	<i>MA AJ</i>	<i>RPZ</i>
JTatum/joan	SRichards	PJohnson	AJohnson	RZimmerman	
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