U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-397/89-14

Docket No. 50-397

License No. NPF-21

Licensee: Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352

Facility Name: Washington Nuclear Project No. 2 (WNP-2)

Inspection at: WNP-2 Site, Benton County, Washington

Inspection Conducted: May 9-19, 1989

Inspector: Clifford A. Clark — 6/2/89
C. A. Clark, Reactor Inspector — Date Signed

Approved by: W. E. Wagner for — 6/2/89
S. A. Richards, Chief — Date Signed
Engineering Section

Inspection Summary:

Inspection During the Period of May 9-19, 1989 (Report No. 50-397/89-14)

Areas Inspected: An unannounced routine inspection by one regional based inspector of Inservice Inspection (ISI) activities. Inspection Procedures 30703, 73051, 73052, 73753, 73755, and 92702 were used as guidance for the inspection.

Results:

General Conclusions and Specific Findings:

The licensee ISI program appeared to be adequate in the areas reviewed. Additional management attention could be used in the area of updating existing ASME Section XI detailed hanger/support drawings with the actual as-built dimensions, see paragraph 5 for additional information.

Significant Safety Matters: None

Summary of Violations: None

Open Item Summary: One enforcement item (paragraph 6) from a previous inspection was closed during this inspection.

DETAILS

1. Persons Contacted

Washington Public Power Supply System

*C. Powers, Plant Manager
*R. Webring, Assistant Maintenance Manager
S. Washington, Compliance
*J. Arbuckle, Compliance Engineer
*R. Rana, ISI Program Leader
*D. Welch, Supervisor NDE Services
J. Steidl, Principal QA Engineer
E. DeBattista, Principal QA Engineer

Contractor Personnel

D. Hoggarth, Authorized Nuclear Inservice Inspector (ANII)-Kemper Group
D. Vance, ANII - Kemper Group

Bonneville Power Administration

*J. Irish, Program Analyst

*Denotes those personnel at the exit meeting on May 12, 1989.

The inspector also held discussions with other licensee and contractor personnel involved with Inservice Inspection activities.

2. Inservice Inspection-Review of Program (73051)

a. Program Approval

Revision 0 to WNP-2 Inservice Inspection (ISI) Program Plan for the first interval (December 13, 1984 to December 13, 1994) and requests for relief, were discussed in an NRC letter from E. G. Adensam to G. C. Sorensen (Dated March 27, 1987). This letter granted and denied specific relief requests, and accepted the ISI plan for implementation, based on two enclosed safety evaluations. The licensee issued interim Revision 1A to the ISI Program Plan on October 7, 1987, to incorporate the information discussed in this NRC letter.

b. Program Organization

The ISI program is based on the requirements of the ASME Code, Section XI, 1980 Edition, through the Winter 1980 Addenda. Nuclear Operation Standard Number NOS-33, Revision 2 of March 7, 1989, entitled "Inservice Inspections", establishes the methods for preparing, controlling and implementing the ISI program. Procedure 8.3.1, Revision 4 of September 27, 1988, entitled "ISI and Appendix

J Examination and Testing Program Administration and Control", describe the conduct of ISI Actives at WNP-2.

c. Quality Assurance Program

Operational Quality Assurance Program Description (OQAPD) WPPSS-QA-004, Revision 12 of June 13, 1988 and Plant Quality Assurance Quality Control Program, WMC-015, Revision 44 addressed QA involvement in the ISI Program. The inspector reviewed the latest QA Surveillance Report, on ISI Activities, Report Number 2-88-052, issued March 18, 1988. This report covered surveillances of ISI actives performed during the third refueling outage (RF88A), for the period of February 19-23, 1988.

No violations or deviations were identified in the areas reviewed.

3. Inservice Inspection-Review Of Procedures (73052)

A sample of the latest revisions of applicable ISI procedures, issued since the last ISI review, were reviewed by the inspector to assure compliance with the ISI program. Some of the procedures reviewed were:

a. QCI 3-1, Revision 5, of March 14, 1989, "Liquid Penetrant Examination Instructions"

b. QCI 3-3, Revision 2, of March 14, 1989, "Liquid Penetrant Examination (WNP-2)"

c. QCI 4-3, Revision 3, of April 19, 1989, "Magnetic Particle Examination (WNP-2)"

d. QCI 6-13, Revision 4, of April 10, 1989, "Ultrason Examination of Piping Welds (WNP-2)"

All the reviewed procedures specified qualification and certification of NDE personnel, where applicable. The technical content, such as, method of examination, extend, and technique, were adequately described in conformance with the requirements and guidance of the ASME Code, Section V. The methods of recording, evaluating, dispositioning, and reporting normal ISI findings were addressed in the applicable procedures. During the procedure review of how the licensee procedures evaluated and dispositioned nonconforming conditions identified during an augmented or ISI NDE examination, the following concerns were identified:

(1) Various ISI procedures, such as procedure QCI 7-3, Revision 1, of March 20, 1986, "Visual Examination - Component Supports", require the NDE examiners to record unsatisfactory/rejected items on the examination data sheets. These same procedures identify that all examination data shall be reviewed by a supply system level II or level III (as directed in the procedure), and that unsatisfactory/rejected items shall have a Data Evaluation Form completed in accordance with NDE & I Instruction QCI 12-8. Instruction QCI 12-8, Revision 2, of February 22, 1988, "NDE Data Evaluation", states in paragraph 3.2 action 6, under NDE Level III

Responsibility, "When the indication's magnitude exceeds the ASME acceptance limit, submits the evaluation sheet to the responsible technical organization (RTO) for disposition."

It appears that the licensee NDE augmented inspections, ISI and data evaluation procedures do not direct NDE personnel to issue nonconformance reports, when nonconforming conditions are first identified during the applicable examinations. During discussions with contractor and licensee NDE examiners, they identified that they could only record their inspection results on examination data sheets, that they could not issue a NCR or PER document for identified nonconforming conditions.

(2) The inspector reviewed some visual examination data sheets that identified unsatisfactory inspection items, on April 25, 1989. A licensee level III examiner initiated ISI evaluation sheets for these items identified as unsatisfactory, on May 7, 1989, which evaluated the reported condition as acceptable as is. The licensee RTO provided concurrence to the final evaluation/justification on May 8, 1989, or approximately 12 days after the nonconformance conditions were first documented. The licensee identified that the systems involved, had been secured for the outage work. A 12 day period between identification of a reported nonconformance condition and evalution/disposition of the same, for an operating system, would not appear to implement the intent of 10 CFR Part 50, Appendix B, Criterion XVI.

(3) It is noted that 10 CFR Part 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, such as...nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrected action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management." One of the licensee documents issued to implement the requirements of 10 CFR Part 50, Appendix B, Criterion XVI, is Administrative Procedure 1.3.12, Revision 13, of December 21, 1988, "Plant Problems-Problem Evaluation Request", which states in paragraph 1.3.12.1:

"A. PER - (Problem Evaluation Request) - A document whose purpose is to establish a controlled method to formally communicate the existence of a plant problem to plant management for action. It is a single sheet form which can be initiated by anyone knowledgeable of an existing or potential plant problem which requires resolution.

B. NCR - (Nonconformance Report) - A document whose purpose is to disposition all Reportable, Potentially, Reportable or Safety Significant plant problems. It is initiated by those members of the plant supervisory staff so designated by the plant manager."

(4) The inspector's main concern in this area, is that the existing NDE/ISI processes for identifying, documenting, resolving, and correcting nonconforming conditions may not be sufficiently rigorous to assure that all non conforming conditions are identified to appropriate levels of station and technical management for timely resolution, review and approval of corrective actions. This concern was discussed with the licensee management during this inspection, and to resolve this concern the licensee management provided the following information/responses:

- While everyone could not write an NCR on an identified nonconforming condition, they can write a PER. A PER written on a significant identified-nonconforming condition, would receive the same immediate licensee response that an NCR would receive, and could be dispositioned as a NCR. The time guideline between the origination of a PER, validation signatures and shift manager signatures on the PER form, is normally not more than 24 hours.

- The licensee identified that they will provide additional instructions to the NDE examiners to ensure that:

  (a) Examiners understand that they can issue a PER.

  (b) A PER should be issued for nonconforming conditions identified in an operating system.

  (c) A PER should be issued for any significant identified nonconforming condition identified during augmented or ISI examinations, that appears to require immediate management attention.

The licensee response to this concern resolved the inspector's existing questions in this area.

No violations or deviations were identified in the areas reviewed.

4. Inservice Inspection-Observation of Work and Work Activities (73753)

During the inspection, the licensee was conducting the RF89A refueling outage, which is the first refueling outage of the second period of the first ten year ISI interval. The ISI examinations were being performed by the licensee staff and contractor ISI examiners provided by General Electric.

The inspector reviewed the Qualification and Certification records for the ISI Examiners, along with the equipment certifications. Available examinations performed on the Main Steam System were observed by the inspector.

No violations or deviations were identified in the areas reviewed.

5. Inservice Inspection Data Review and Evaluation (73755)

The inspector reviewed all available NDE ISI examination data sheets and ISI evaluation sheets generated on approximately one hundred ten ISI examinations, performed prior to and during this inspection. Minor discrepancies were identified with the methods of recording inspection results on some examination data sheets. The examination data sheet discrepancies were identified to the licensee and ANII. The licensee identified that the applicable examination data sheets will be changed, and additional instructions provided to the new contractor ISI examiners, to ensure the licensee standard data recording format is followed during data recording.

During the review of some visual examination data sheets such as Report No. 1HV-0109, it appears the existing licensee hanger detail drawings provided to the ISI examiners for use during the ISI examinations, have not been updated with the latest as-built dimensions. Discussions with licensee personnel, identified that they are aware that some drawings have not had the as-built dimensions updated since 1984, and they are working on this area. It appears that this area could use additional management attention.

No violation or deviations were identified in the areas reviewed.

6. Follow-up on Items of Noncompliance and Deviations (92702)

(Closed) Enforcement/Violation (50-397/85-17-01), ISI Failure to Properly Establish/Implement Code Requirements, ASME XI, IWV-3417 Valve Stroke Times

During a May 1985 inspection, a violation was identified where WNP-2 valve stroke test times were not being compared against previous valve stroke test times, as required per ASME Section XI, Subsection IWV-3417. A second part of the violation addressed a summary listing of pumps and valves to document the current status of testing and a summary of corrective actions taken with regard to pumps. The licensee took exception to this violation, in a letter to Region V (G. C. Sorensen to J. B. Martin) dated August 21, 1985.

To obtain a third party review on the validity of the original violation, a request for transfer of responsibility for evaluation of the licensee's response was issued to NRR in a memorandum (D. F. Kirsch to H. L. Thompson, Jr.) dated September 9, 1985.

After reviewing the original documentation and several discussions between Region V and NRR, the NRR/Mechanical Engineering Branch, agreed with Region V position, that the ASME Code, Section XI must be followed unless relief has been granted by the NRC/NRR.

- While the valve surveillance program currently being implemented by the licensee is being reviewed and relief will probably be granted in this area, at the time of the May 1985 NRC ISI Inspection, the NRC/NRR had not been notified by the licensee through either a program submittal or relief request that the licensee was not

following the ASME Code. After the May 1985 inspection identified this violation, the licensee submitted a relief request in June of 1985 as part of Revision 3 of the WNP-2 Pump and Valve Inservice Test Program Plan, to clarify the Supply System's position on valve surveillances in this area.

- At the time of the May 1985 NRC IST Inspection, the licensee did not provide the following for review by the inspectors: (1) a summary listing of pumps and valves to document the current status of testing, nor (2) a summary of corrective actions taken with regard to the pumps. The purpose for having the subject summary documents, is to provide a source of information readily available for Engineering, Technical and Management Review. This information would be used in determining the status of equipment and systems, corrective actions required for pumps and other equipment, etc. Since the subject summary listing documents were not available in May of 1985, for NRC review, this part of the original violation was also found to be valid. At the present time, the licensee is working on computerizing the IST surveillance information, corrective actions, and these areas will be reviewed in future inspections.

  Based on the above information, and the NRC/NRR latest information in this area, the original violation was valid and it appears that appropriate actions have been taken. This item is closed.

7. Exit Meeting (30703)

The inspector met with licensee management representatives denoted in paragraph 1 on May 12, 1989. The scope of the inspection and the inspector's finding up to the time of the meeting were discussed. At this meeting the inspector identified that he had obtained some information that would be reviewed later in the Region, with the findings documented in this report. The information was reviewed and the findings included in paragraphs 3 and 5 of this report.