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SUBJECT: Responds to NRC 890802 ltr re violations noted in Insp Rept
 50-397/89-20.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 29, 1989
G02-89-146

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 89-20
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 2, 1989. 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, the violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

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APPENDIX A

During an NRC inspection conducted on July 10 - 14, 1989, two 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, (1988), as modified by 53 Fed. Reg. 40019 (October 13, 1988), the violation is listed below:

- A. Technical Specification 6.5.2, Corporate Nuclear Safety Review Board, states in part:

"Audits of unit activities shall be performed under the cognizance of the CNSRB. These audits shall encompass:

- b. The performance, training and qualifications of the entire unit staff at least once per 12 months."

Contrary to the above, as of July 10, 1989, an audit of the performance, training and qualifications of the entire unit staff had not been conducted for a period of 21 months, in that Equipment Operators were specifically excluded as part of the regularly scheduled audit of 1988, having been last reported as audited on October 9, 1987.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation is that, during the audit, the team leader made the decision to concentrate efforts on the review of licensed operations personnel and outage personnel, and not review non-licensed operations personnel. This decision was based upon the knowledge that previous audits have found that equipment operators were properly trained and qualified.

The plan for Audit 88-453 was developed to include a sampling of members from each department of the unit staff. The scope included Health Physics/Chemistry, Maintenance, Plant Technical (Shift Technical Advisors) and Operations (licensed and non-licensed). Also included for review were Nondestructive Examination and Inspection personnel, and non-Supply System outage craft personnel. These two latter groups are not defined as members of the unit staff.

Corrective Steps Taken/Results Achieved

- 1) A 100% review of the training, qualification and performance records for all Equipment Operators (EOs) was conducted on July 17 - 18, 1989 and no discrepancies were noted. Records show that at least five EOs are assigned to each shift that are certified to perform the duties of a Reactor Building/Radwaste Operator and Radwaste Control Room Operator. Currently, 29 EOs are fully certified for these two areas. Records also show that the same EOs were certified at the time Audit 88-453 was performed in September, 1988.
- 2) A memo has been placed in the training audit file notifying the lead auditor to include the following departments in future audits:
 - a) Maintenance (Mechanical, Electrical and Instrument and Controls)
 - b) Health Physics/Chemistry (including HP/Chem Support)
 - c) Operations (Licensed and Non-Licensed personnel)
 - d) Plant Technical (all disciplines, including Shift Technical Advisors)

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

The Supply System is currently in full compliance.