UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

JUL 23 1990

Docket No. 50-397

Washington Public Power Supply System
Attention: Mr. C. Sorensen, Manager
Regulatory Programs
P. O. Box 968
3000 George Washington Way
Richland, Washington 99352

Gentlemen:

Subject: INSPECTION REPORT 90-09 NOTICE OF VIOLATION 90-09-01

Washington Public Power Supply System's letter from G. D. Bouchey, Director, Licensing & Assurance, dated May 29, 1990, addressed your position on the subject Notice of Violation. We understand that you do not recognize the validity of this violation, and that you consider your facility to be in full compliance with the applicable requirements.

We have reviewed your position on the two issues of this violation, and continue to consider that you were in violation of the requirements cited at the time of the inspector's observations and findings. Our rationale for this determination is detailed in Attachment A to this letter.

However, considering the measures that were taken to improve the previous procedural guidance, and the field training given subsequently to your operators, it appears that adequate steps were taken to remediate the weaknesses related to this violation. Therefore, no further response is required.

Your corrective actions to revise the procedures referenced in the Notice of Violation will be verified in a follow up inspection.

Should you have any further questions concerning this violation, we will be glad to discuss them with you.

Sincerely,

D. F. Kirsch
for R. P. Zimmerman, Director
Division of Reactor Safety and Projects

Attachment:
As Stated

IE01

cc w/Attachment A:
Mr. J. W. Baker, WNP-2 Plant Manager
Mr. A. G. Hosler, WNP-2 Licensing Manager
Mr. G. D. Bouchey, Director, Assurance & Licensing
Mr. G. E. Doupe, Esq., WPPSS
Mr. A. Lee Oxsen, Assistant Managing Director for Operations
State of WA (Curtis Eschels)
Mr. M. H. Phillips, Attorney
Bishop, Cook, Purcell & Reynolds

cc w/Attachment A:
Mr. J. W. Baker, WNP-2 Plant Manager
Mr. A. G. Hosler, WNP-2 Licensing Manager
Mr. G. D. Bouchey, Director, Assurance & Licensing
Mr. G. E. Doupe, Esq., WPPSS
Mr. A. Lee Oxsen, Assistant Managing Director for Operations
State of WA (Curtis Eschels)
Mr. M. H. Phillips, Attorney
Bishop, Cook, Purcell & Reynolds

bcc:

Docket File	G. Cook	M. Smith
Resident Inspector	B. Faulkenberry	N. Western
Project Inspector	J. Martin	J. Zollicoffer

A. Johnson

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
MEADOWS	LMILLER	KIRSCH	AJOHNSON	ZIMMERMAN
7/9/90	7/9/90	7/20/90	7/20/90	7/23/90

SEND TO PDR
YES / NO

ATTACHMENT A

Background:

Washington Public Power Supply System's letter, G. D. Bouchey, Director, Licensing & Assurance, dated May 29, 1990, addressed their position on the subject Notice of Violation (90-09-01).

The licensee did not recognize the validity of this violation, and determined that they were full compliance with the regulations of issue. The NRC reviewed the licensee's position on the two issues of the violation, and maintains that the licensee was in violation at the time of the inspection findings.

The NRC's Position and Findings:

During the period of January 29, through February 8, 1990, the NRC conducted a validation review of the licensee's licensed operator requalification program testing materials. This site visit was performed in accordance with NUREG 1021, ES-601, to prepare for the licensee's formal program evaluation on February 27, through March 9, 1990. During the validation review period (January 29 through February 8, 1990) two findings concerning deficient procedures, encompassing safety related tasks, were the subject of the Notice of Violation (90-09-01).

WNP-2 Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained, "covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

The inspection concluded that two of the licensee's operating procedures were not adequately established, implemented, and maintained, as follows:

First issue: One simulator operating scenario (under review by the NRC examiner) required an operating crew to mitigate an uncontrolled slow depressurization of the Main Steam System and Reactor from 100% power. The event was initiated by the failure of the Main Steam Bypass Valves to close. The operating crew was expected to mitigate the event consequences by timely remote closure of a common isolation valve to the steam bypasses. This action effectively stabilizes the plant before the automatic low pressure group isolation safety function is challenged. No abnormal operating procedure existed (at the time of this finding) to address this action.

Second issue: During the review of one of the licensee's "On the Job Training" (OJT) tasks, the examiner found that Emergency Procedure, PPM 5.1.3, provided inadequate guidance for a typical operator to perform the task of venting the overpiston area of an affected control rod, in an Anticipated Transient Without Scram (ATWS) scenario after all other means of attempted rod insertion failed. This emergency could occur due to the obstruction of an individual control rod (or control rod group) overpiston piping, or a malfunction preventing the draining of the common scram discharge volume. In either case, the affected rod (or rods) would be hydraulically locked in place. The procedure provided only two general steps: open and vent the overpiston area, and then stop doing this when the rod is inserted. The NRC inspector and the licensee's operations procedure group determined that this task required a minimum of 10 comprehensive steps to complete successfully. Therefore, the examiner concluded that the two step procedure was inadequate.

The examiner concluded that the above two procedural deficiencies did not comply with the cited regulation.

An exit meeting was held with the NRC examiners, the WNP-2 resident inspector, and representatives of the licensee's staff on March 9, 1990 to discuss the program evaluation and the NRC findings.

During the program evaluation period, the licensee staff acknowledged the examination team's findings and indicated that steps were being taken in these areas to correct the deficiencies.

The Licensee's Position and NRC Response:

First Issue:

The licensee does not agree with the NRC's conclusion that the requirements of Regulatory Guide 1.33 are violated, since their existing Emergency Procedures, coupled with normal plant operating recovery procedures and the automatic (or manual) Main Steam Isolation Valve (MSIV) isolation safety feature, would adequately mitigate the depressurization event. The licensee suggests that plant design features, combined with the symptomatic-based Emergency Operating Procedures would appropriately address this malfunction.

The NRC agrees that the plant design MSIV isolation safety feature, coupled with Emergency Procedures, as written to implement the Boiling Water Reactor Owners Group - Emergency Procedure Guidelines (BWROG-EPG's), and appropriate operator action during a recovery, are designed to place the plant in a safe condition. However, in this case, the NRC considers that a designed safety system should not be unnecessarily challenged if it is possible to mitigate the associated degrading conditions, by appropriate event based procedures (Abnormal Operating Procedures). This is consistent with Regulatory Guide 1.33. The Emergency Procedures Guidelines (EPG's) are applicable to more severe conditions where plant operators should not attempt to diagnose the initiating events to most effectively protect the plant and the public. The NRC does not agree that EPG's coupled with plant design features supersede the requirements of Regulatory Guide 1.33. Considering this, the NRC maintains that the violation is valid on this issue.

The NRC noted that the licensee acknowledged that procedural guidance should have been provided for a Reactor Pressure Vessel (RPV) depressurization event, and subsequently created this procedure, PPM 4.2.1.14, "Inadvertent RPV Depressurization", on February 15, 1990. Therefore, further reply regarding this issue from the licensee is not necessary.

Second issue:

The licensee contends that their EPG's meet the intent of Regulatory Guide 1.33, as applied to this issue. The licensee states "from an overall perspective", relative to the Regulatory Guide 1.33 requirement for procedures for mitigating an inability to drive control rods, that their EPG's meet the requirement since they provide "thirteen different actions/methods to reduce reactor power and shutdown the reactor in the event control rods fail to automatically insert when required." The licensee determined that "the balance between the level of detail in the procedure and the level of detail of the training provided to perform that procedure were adequate." The licensee clarifies that it is their position that, "so long as the combination of level of procedural detail and the scope/ level of detail of the training results in the consistent ability of the procedure user to correctly perform the task, the level of procedural guidance is adequate." They further state that, in this specific instance, the operator did perform the NRC observed task correctly, and have identified ongoing OJT training for local Control Rod Drive (CRD) emergency overpiston venting.

The NRC agrees with the licensee's "overall perspective" application of the EPG's - to the extent that they are symptom based (written to the BWROG-EPGs). Furthermore, the NRC agrees with the licensee's position on the balance of procedural detail and operator training, if the result is consistently correct operator performance. However, the NRC does not agree with the licensee's application of these broad principles to this specific deficiency, as originally found by the NRC examiner. EPG's are, indeed, symptom based. However, when they direct a specific task to be performed, enough detail must be provided to insure the consistently correct completion of that task. This is usually accomplished by the site specific Emergency Operating Procedure (EOP) expanding on the general EPG's provided by the BWROG, or by referring the operator to an applicable "event based" recovery procedure or appendix. The specific EOP action step of concern, originally consisted of two general parts (as stated in inspection report 50-397/90-09): (1) open the affected Hydraulic Control Unit's overpiston area vent valve, and drain the area to the provided controlled floor drain; and then, (2) close the vent valve. The operator that walked through the task with the NRC examiner did so with difficulty. In fact, the licensee's operating and training staffs revised this step before the scheduled program evaluation of their OJT training program, so that their operators could be fairly evaluated. Both the observing NRC examiner and the operator originally validating this task agreed that these measures were necessary. This revised procedure significantly increased the detail of the procedure, encompassing approximately thirteen additional parts. This new procedure addressed: (1) Where to find and locate the correct vent valve, (2) How to isolate/unisolate the vent valve (remove and restore the vent plugs with special handling tools), (3) Specifically, where to drain the overpiston area, using a special hose (addressing the radiological precautions), and finally (4) How to return the system lineup. Considering this, the NRC maintains that the violation is valid on this issue.

In conclusion, the NRC believes that the issuance of a Severity Level IV violation was warranted for both of these issues. However, considering measures that were taken to improve the procedural guidance and field training of licensee operators, it appears that adequate steps were taken to remediate issues of the violation. Consequently, no further action by the licensee is required, pending a follow-up inspection to review these revised procedures.