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SUBJECT: Responds to NRC 900828 ltr re violations noted in Insp Rept 50-397/90-16.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 27, 1990
G02-90-157

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, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 90-16
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 28, 1990. 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. As requested, Appendix A also addresses the actions planned to ensure that an effective lubrication monitoring program is in place for other important plant components.

Very truly yours,

G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

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

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PDR ADOCK 05000397
Q PIC

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Appendix A

During an NRC inspection conducted on June 18 - July 29, 1990 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification Section 6.8.1 states in part: "Written procedures shall be established, implemented, and maintained covering the activities written below:

"a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A of Regulatory Guide 1.33, Section 9, "Procedures for Performing Maintenance", states in part: "Preventive maintenance schedules should be developed to specify lubrication schedules...."

Contrary to the above, as of June 20, 1990, a maintenance schedule had not been established for changing the motor bearing lubricating oil for standby service water pump motors SW-P-1A and SW-P-1B, or high pressure core spray pump motor HPCS-P-2, all of which are safety-related; and the lubricating oil for these pump motors had not been changed since plant startup in 1983.

This item represents a Severity Level IV violation (Supplement 1).

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation is less than adequate direction given by the Preventive Maintenance (PM) program. The preventive maintenance task card for these Standby Service Water (SSW) pump motors directed personnel to complete Plant Procedure (PPM) 10.25.12, "Inspection of AC Motors, Controls and Generators," on a two-year frequency. This procedure provided direction to lubricate when required and scheduled in accordance with the WNP-2 Lubrication Guide. However, the Lubrication Guide did not specify a frequency for motor oil changeout.

A contributing factor was that, although the WNP-2 Lubrication Guide is controlled as a Certified Vendor Information (CVI) document, it does not receive the same level of review and approval as that of formal Plant procedures. Plant procedures are reviewed by the Plant Operating Committee (POC) and approved by the Plant Manager.

Corrective Steps Taken/Results Achieved

1. The oil in the motors for SW-P-1A, SW-P-1B and HPCS-P-2 was replaced with lubrication oil as recommended by the motor manufacturer. In addition, samples of the existing lube oil in all three pump motors were tested and determined to be acceptable.

2. The PM task for monitoring lubrication oil status in the motors for pumps SW-P-1A, SW-P-1B and HPCS-P-2 was strengthened to require sampling of the oil on an annual basis, and changeout if necessary.
3. A review of lubrication oil type and changeout frequency for all safety-related pump motors was performed and no further discrepancies were noted.

Corrective Action to be Taken

1. Efforts are currently in process for a complete overhaul of the Preventive Maintenance Program. The Supply System has contracted with General Physics Corporation for a review of the entire WNP-2 PM Program by utilizing Reliability-Centered Maintenance (RCM) techniques to develop recommended maintenance tasks and frequencies. This effort began during the Spring of 1990 and will continue over a 30-month period, with recommendations implemented incrementally during that time as individual system studies are completed. As part of the review, the contractor will utilize industry and Plant failure data, vendor guidance, and individual system failure mode and effect analyses to provide recommendations for all future preventive maintenance and condition monitoring activities, such as lubrication oil sampling and changeout frequencies. This overall evaluation of the PM Program will also provide for a review, by Plant Maintenance and Technical personnel, of those recommendations developed by the contractor.

Program improvement initiatives include preparation of component-specific work instructions for each recommendation and expansion of the existing monitoring program to better predict component condition. This effort will also include a review of existing task descriptions to verify adequacy, and either improve the description or provide additional instructions as necessary. Through implementation of this thorough, detailed approach, future PM Program activities can be performed with assurance of a sound basis for each task.

2. An internal review of preventive maintenance is currently underway for three systems which were identified by Supply System Probability Risk Assessment (PRA) studies as being critical to Plant Safety. The three systems are Standby Service Water, Residual Heat Removal and 125 VDC. The purpose of this review is to identify any further omissions or outstanding failures in PM Program scope or implementation. Although a preliminary evaluation has been performed, the review will be completed by October 15, 1990.

3. The WNP-2 Lubrication Guide will be converted into a formal Plant procedure.

Date of Full Compliance

Full compliance was achieved with completion of the lubrication oil review for all safety-related pump motors, and when lubricating oil replacement efforts were completed for pump motors SW-P-1A, SW-P-1B and HPCS-P-2 on August 3, 1990.