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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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August 9, 1991
G02-91-148

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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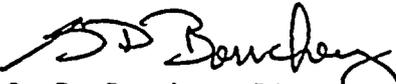
Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 91-12
RESPONSE TO NOTICES OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notices of Violation contained in your letter dated July 10, 1991. 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 violations are 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 - Winston & Strawn
PL Eng - NRR
DL Williams - BPA/399
NRC Site Inspector - 901A

9108140/30



APPENDIX A

During an NRC inspection conducted on April 1 - May 12 and May 16, 1991, 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 (1991), the violations are listed below:

- A. Section 6.8.1 of the Technical Specifications states, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A states in part:

- "4. Procedures for Startup, Operation, and Shutdown of Safety-Related BWR Systems:

w.(2)(a) Emergency Power Source (e.g., diesel generator...)"

PPM 2.7.2, Emergency Standby AC Generator, Revision 16, Deviation 91-140, Section 6.1.4.j, states in part: "Adequate lubrication of the bearing occurs down to 3/8 inch below the low level mark. This is the absolute lowest level which may be allowed prior to taking immediate action to secure the unit...."

Contrary to the above:

On April 5, 1991 bearing oil level was observed by licensee personnel to be 3/4 inch below the low level mark on the Division I Emergency Diesel Generator while operating at rated speed, in a non-emergency condition, and immediate action was not taken to secure the unit. Instead, the unit was returned to idle speed after a few minutes had elapsed.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was Less Than Adequate Procedures in that the instructions to "take immediate action to secure the unit" allowed Plant Operators to interpret that it was not necessary to immediately stop the engine, but that a controlled shutdown was appropriate. As stated in LER 91-006, PPM 2.7.2 essentially stated that, if the oil level decreased to less than 3/8-inch below the sight glass low level mark, to take immediate action to secure the unit (disable from start and declare unit inoperable). At the time of the event, the diesel had been running for a few minutes when the low (sight glass) oil level for the generator thrust bearing was first noticed and measured. The Shift Support Supervisor left



the Diesel Generator (DG) room due to high noise level and called the Control Room Supervisor to discuss the situation. The decision was made to take the diesel back to idle speed, at which point the oil level returned to the allowable range. The period between first discovering the low level indication and taking the unit to idle speed is estimated to have been from two to five minutes. Although the intent of PPM 2.7.2 was to immediately shutdown the DG upon a low level condition, Plant Operators believed at the time that they were following the procedure and were taking actions to "immediately secure the unit."

Corrective Steps Taken/Results Achieved

Immediately following the event, Plant Procedures (PPMs) 2.7.2, "Emergency Standby AC Generator," and 7.4.8.1.1.2.1, "Diesel Generator No. 1 - Monthly Operability Test," were revised to clarify the method of shutdown of the unit. Direction was added to the procedures that, "If the oil level is less than or equal to 3/8-inch below the mark in a non-emergency condition, immediately stop the diesel by depressing the Emergency Stop Pushbutton (and declare the unit inoperable)." This direction was also included in the Plant Operations Night Orders.

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

Full compliance was achieved on April 5, 1991 when PPMs 2.7.2 and 7.4.8.1.1.2.1 were revised to clarify the method of diesel shutdown.

- B. 10 CFR 50, Appendix B, Criterion VI, Document Control, states, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes ... are distributed for use at the location where the prescribed activity is performed."

Section 6.2.2 of the WPPSS Operational Quality Assurance Program Description (OQAPD) Manual states, in part: "Procedures that control the preparation, review, approval, and issuance of documents, including changes thereto, shall contain provisions which provide assurance that:

- "f. Approved changes to documents are promptly incorporated into instructions, procedures, drawings and other documents."







Contrary to the above:

On April 5, 1991, changes to a procedures prescribing an activity affecting quality were not distributed for use at the location where the activity is performed. Specifically, a controlled copy of PPM 5.3.1 (Secondary Containment Control), located in the Remote Shutdown Room, did not contain procedure deviation 90-1075, which was issued on October 17, 1990. This deviation corrected errors in the listing of the locations required to monitor various plant parameters after an accident.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reasons for the violation were 1) Work Practices Less Than Adequate in that an incorrect EOP flowchart was placed in the Remote Shutdown Room and 2) Procedures Less Than Adequate to ensure that the EOP flow charts are properly updated. In December 1990, full-size flowcharts were added to the Remote Shutdown Room. Because full-size charts were being used and due to the expertise required to correctly implement an update, "current master versions" were retained by Plant Operations personnel instead of Plant Administration (the normal procedure control group).

In this particular case, the procedure was deviated by Plant Operators on shift and flowcharts were updated at all in-use stations. A copy of the deviation was also sent to Plant Administration for filing purposes. At the time the deviation was approved, there were no full-size EOP flow charts in the Remote Shutdown Room. However, when the decision was made to include full-size EOP flowcharts in the room (approximately two months later), the Plant Operations EOP Coordinator added the flowchart, using the master revision, but failed to check if there were any outstanding deviations that would have required updating of the master.

In addition, no formal method or policy existed which defined the process for updating of the EOP flowcharts.

Corrective Steps Taken/Results Achieved

- 1) Action was taken immediately to correct the flowchart in the Remote Shutdown Room when this problem was brought to our attention by the Resident NRC Inspector. In addition, all EOP flowcharts in the Remote Shutdown Room were reviewed to ensure the charts were up-to-date. No further discrepancies were noted.
- 2) The EOP Coordinator was counselled on the importance of ensuring that EOP flowcharts are accurate before being distributed to the work locations.



Corrective Action to be Taken

- 1) The process for control of EOP flowcharts will be formalized by revising Plant Procedure (PPM) 1.2.3, "Use of Controlled Plant Procedures," to identify the Plant Operations Procedure Coordinator as the responsible individual to approve EOP flowchart deviations/revisions.
- 2) Plant Administration will also perform a semi-annual audit of the EOP flowcharts.

Date of Full Compliance

Full compliance was achieved when the EOP flowchart in the Remote Shutdown Room was corrected.

- C. Section 6.8.1 of the Technical Specifications states in part: "Written procedures shall be established, implemented and maintained covering the activities referenced below:

g. Fire Protection Program implementation"

PPM 1.3.10, Revision 11, Fire Protection Program, states in part:

"8.1 Transient Combustible Permit Procedure

8.1.1 - Used to control combustibles, flammables, etc. that are introduced into the plant on a temporary basis."

Table 8.7a of PPM 1.3.10 requires that a Transient Combustible Permit be approved for any combustible material which is temporarily used or stored within a vital area of the plant.

Contrary to the above:

- 1) On April 11, 1991, two partially filled 55-gallon drums of lube oil were located in the Division I Emergency Diesel Generator room (a vital area). No Transient Combustible Permit had been issued.
- 2) On April 11, 1991, 21 rolls of plastic with a total estimated weight of about 1850 pounds, a cardboard box containing a HEPA filter which measured approximately 2.5 by 2.5 by 1.0 feet, and four plastic bags containing cloth mopheads were located in room D-113 in the Diesel Generator Building (a vital area). No Transient Combustible Permit had been issued.

The above items constitute a Severity Level IV violation (Supplement I).



Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the first part of the violation was Work Practices Less Than Adequate in that the Maintenance Work Request (MWR) that was prepared for flushing and refilling of the Diesel Generator (DG-1) generator bearings did not specify that a Transient Combustible Permit was required. Plant Procedure (PPM) 1.3.10, "Fire Protection Program," requires a Transient Combustible Permit for high flash point liquids (i.e., oil) that are taken into both vital and non-vital areas of the Plant. The reason for the second part of the violation was Supervisory Oversight Less Than Adequate. Although this area was approved as a storage area, ongoing oversight and direction provided to Plant personnel was less than adequate to ensure that the combustible loading of the area was not exceeded without further evaluation by the Plant Fire Marshal.

Corrective Steps Taken/Results Achieved

The combustibles were removed from the Diesel Generator Rooms noted.

Corrective Action to be Taken

- 1) Specific instruction and direction on the requirements of Transient Combustible Permits will be provided to those Electrical Maintenance personnel who prepare Maintenance Work Requests.
- 2) Guidelines for fire loading and the use of Transient Combustible Permits will be provided to Plant personnel involved in the handling and storage of expendable materials.

Date of Full Compliance

Full compliance was achieved when the combustible material was removed from the Diesel Generator Rooms.

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SUBJECT: Responds to NRC 910710 ltr re violations noted in insp rept
 50-397/91-12 on 910401-0512 & 0516. Corrective actions:
 plant procedures 2.7.2, "Emergency Standby AC Generator," &
 7.4.8.1.1.2.1, "Diesel Generator...", revised.

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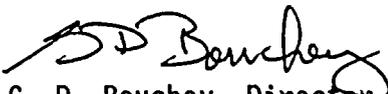
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In Appendix A, the violations are addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,


G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

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

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APPENDIX A

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A. Section 6.8.1 of the Technical Specifications states, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

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

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A states in part:

"4. Procedures for Startup, Operation, and Shutdown of Safety-Related BWR Systems:

w.(2)(a) Emergency Power Source (e.g., diesel generator...)"

PPM 2.7.2, Emergency Standby AC Generator, Revision 16, Deviation 91-140, Section 6.1.4.j, states in part: "Adequate lubrication of the bearing occurs down to 3/8 inch below the low level mark. This is the absolute lowest level which may be allowed prior to taking immediate action to secure the unit...."

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was Less Than Adequate Procedures in that the instructions to "take immediate action to secure the unit" allowed Plant Operators to interpret that it was not necessary to immediately stop the engine, but that a controlled shutdown was appropriate. As stated in LER 91-006, PPM 2.7.2 essentially stated that, if the oil level decreased to less than 3/8-inch below the sight glass low level mark, to take immediate action to secure the unit (disable from start and declare unit inoperable). At the time of the event, the diesel had been running for a few minutes when the low (sight glass) oil level for the generator thrust bearing was first noticed and measured. The Shift Support Supervisor left



the Diesel Generator (DG) room due to high noise level and called the Control Room Supervisor to discuss the situation. The decision was made to take the diesel back to idle speed, at which point the oil level returned to the allowable range. The period between first discovering the low level indication and taking the unit to idle speed is estimated to have been from two to five minutes. Although the intent of PPM 2.7.2 was to immediately shutdown the DG upon a low level condition, Plant Operators believed at the time that they were following the procedure and were taking actions to "immediately secure the unit."

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Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

Full compliance was achieved on April 5, 1991 when PPMs 2.7.2 and 7.4.8.1.1.2.1 were revised to clarify the method of diesel shutdown.

- B. 10 CFR 50, Appendix B, Criterion VI, Document Control, states, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes ... are distributed for use at the location where the prescribed activity is performed."

Section 6.2.2 of the WPPSS Operational Quality Assurance Program Description (OQAPD) Manual states, in part: "Procedures that control the preparation, review, approval, and issuance of documents, including changes thereto, shall contain provisions which provide assurance that:

- "f. Approved changes to documents are promptly incorporated into instructions, procedures, drawings and other documents."

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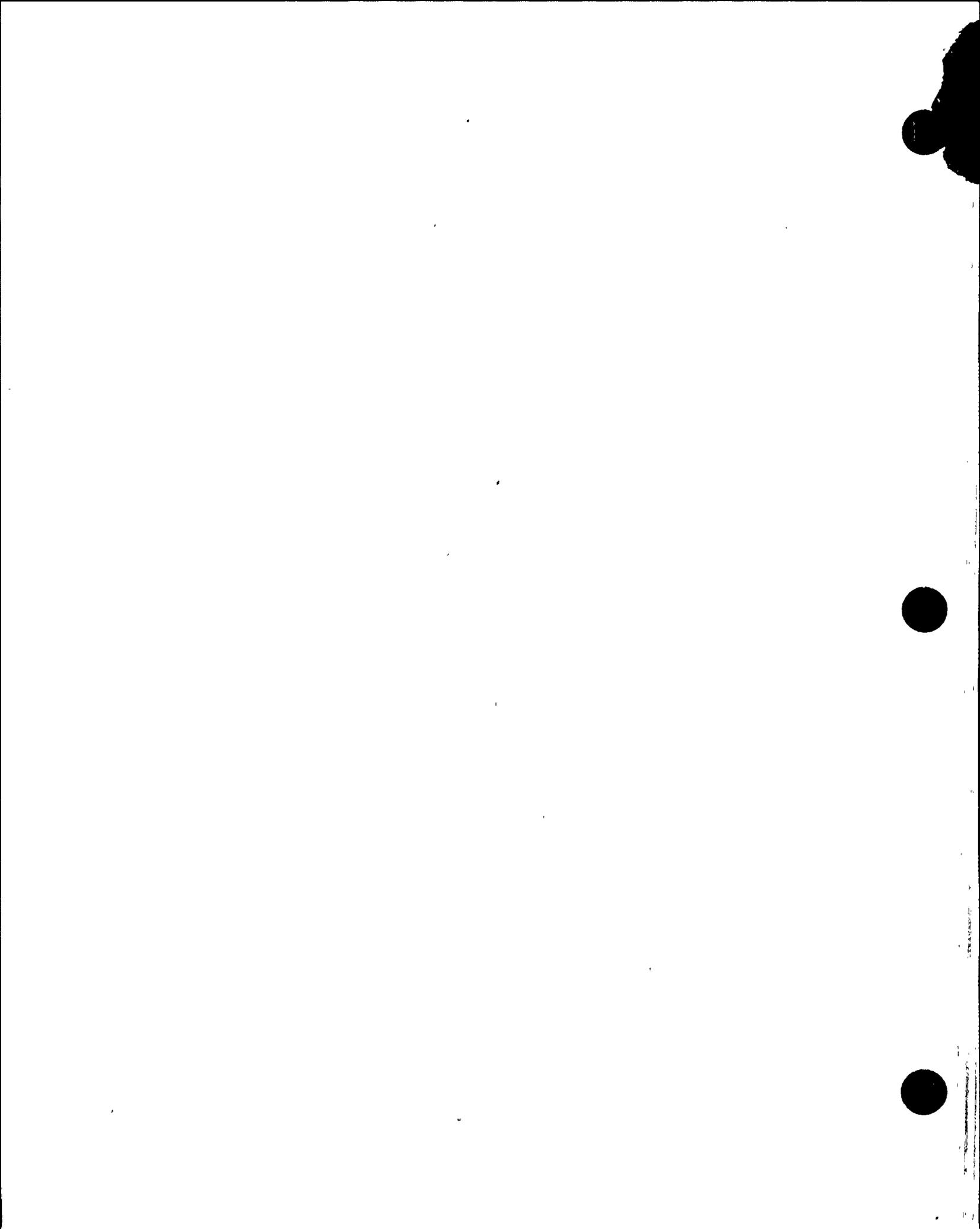
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- 2) Plant Administration will also perform a semi-annual audit of the EOP flowcharts.

Date of Full Compliance

Full compliance was achieved when the EOP flowchart in the Remote Shutdown Room was corrected.

- C. Section 6.8.1 of the Technical Specifications states in part: "Written procedures shall be established, implemented and maintained covering the activities referenced below:

g. Fire Protection Program implementation"

PPM 1.3.10, Revision 11, Fire Protection Program, states in part:

"8.1 Transient Combustible Permit Procedure

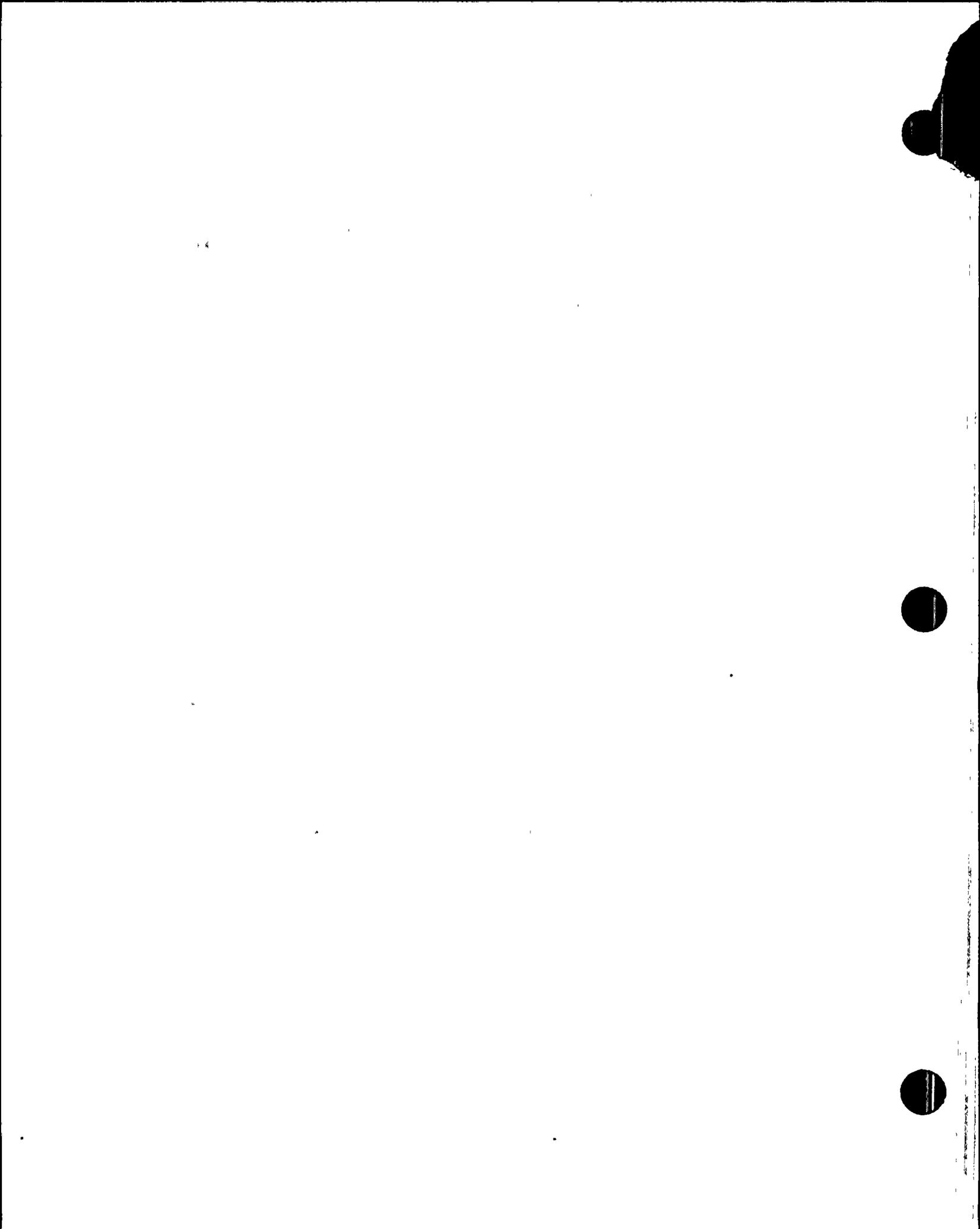
8.1.1 - Used to control combustibles, flammables, etc. that are introduced into the plant on a temporary basis."

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Corrective Steps Taken/Results Achieved

The combustibles were removed from the Diesel Generator Rooms noted.

Corrective Action to be Taken

- 1) Specific instruction and direction on the requirements of Transient Combustible Permits will be provided to those Electrical Maintenance personnel who prepare Maintenance Work Requests.
- 2) Guidelines for fire loading and the use of Transient Combustible Permits will be provided to Plant personnel involved in the handling and storage of expendable materials.

Date of Full Compliance

Full compliance was achieved when the combustible material was removed from the Diesel Generator Rooms.