

## UNITED STATES NUCLEAR REGULATORY COMMISSION REGION V

1450 MARIA LANE, SUITE 210 WALNUT CREEK, CALIFORNIA 94596

Docket No. 50-397

AUG 1 6 1991 .

Washington Public Power Supply System P. O. Box 968 3000 George Washington Way Richland, Washington 99352

Attention: Mr. G. C. Sorensen

Manager, Regulatory Programs

SUBJECT: NRC INSPECTION OF WASHINGTON NUCLEAR PLANT NO. 2

This letter refers to the inspection led by Mr. Dave Corporandy of this office, during the weeks of May 20 and June 3, 1991, of activities authorized by NRC License No. NPF-21, and to the discussion of our findings held with members of your staff on June 7, 1991. Additional in-office review of licensee provided documents continued through June 21, 1991. The inspection evaluated the adequacy of Supply System actions to assure the reliability of motor operated valves (MOVs). Our inspectors reviewed the program that you have developed in response to NRC Generic Letter GL 89-10, "Safety-Related Motor Operated Valve Testing and Surveillance." Generic Letter GL 89-10 provides recommendations for licensees to develop and implement programs to ensure that MOVs will operate properly under design basis conditions.

Specific areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations of ongoing maintenance and testing of MOVs.

Based on the results of this inspection, one of your activities appears to be in violation of NRC requirements and a number of your activities appear to deviate from your commitment to the NRC. These activities are documented in the attached Notice of Violation and Notice of Deviation, respectively. You are required to respond to this letter and should follow the instructions in the enclosed Notices when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to these Notices, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

Based on the findings of this inspection, it appears that several areas of your program are weak and deviate from the recommendations of GL 89-10. In our letter, dated June 28, 1991, we identified to you a number of concerns which we considered sufficiently important to be brought to your attention in advance of the enclosed inspection report. We, further, requested that you address those concerns in your response to the issues identified in this report. Areas of programmatic weakness are described within the enclosed inspection report. Many of the weaknesses can be attributed to inadequate use of industry knowledge and experience, insufficient engineering involvement in assessing MOV failures, and ineffective management attention and oversight of your program.

910B300001 910B14 PDR ADDCK 05000397

IEO/

The second of th

We are especially concerned about your performance in assessing and resolving the MOV spring pack relaxation issue identified in this report. This is a significant safety issue which did not receive proper licensee technical evaluation, in part, because approved quality assurance and management systems were not followed. We are, also, concerned that by replacing these safety related MOV spring packs, without proper evaluation of the deficiency, you missed an opportunity to establish as-found conditions and assess the operability of the valves.

We recognize that your quality assurance and oversight groups identified, in advance of the NRC inspection, problems in this area such as: (1) your program for testing MOVs was behind schedule, (2) that you failed to meet some commitments relative to MOVs, and (3) the inadequate training of personnel engaged in MOV testing. However, the current status of your program suggests that you did not use these opportunities to penetrate and analyze the condition of your entire GL 89-10 program.

In view of the importance of maintaining your MOV program in line with your stated objectives, we urge you to reflect on the current direction of the program, and to promptly assess and respond to the need for improvement in the areas discussed in the enclosed inspection report. In your assessment, please consider whether the situations identified in this report are symptomatic of engineering work, in general, especially considering your ongoing engineering improvement programs.

In accordance with 10 CFR 2.790(a), a copy of this letter will be placed in the NRC Public Document Room. Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

The responses directed by this letter and the enclosed Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Sincerely.

R. P./Z/mmerman, Director

Division of Reactor Safety and Projects

## Enclosure:

Appendix A - Notice of Violation Appendix B - Notice of Deviation

Inspection Report No. 50-397/91-16

cc w/enclosures (1), (2) and (3): J. W. Baker, WNP-2 Plant Manager

A. G. Hosler, WNP-2 Licensing Manager

G. D. Bouchey, Director, Assurance & Licensing G. E. Doupe, Esq., WPPSS

A. Lee Oxsen, Deputy Managing Director State of WA

M. H. Phillips, Esq.

bcc w/enclosures (1), (2) and (3):
Docket File
J. Martin
B. Faulkenberry
G. Cook
Resident Inspector
Project Inspector

bcc w/o enclosure (2):
J. Zollicoffer
M. Smith
J. Bianchi

RV/jk

T DEAUCET PART	/ I DEAUECT CARV I	DEALECT CANV	T DEATHER FANY	T DEATHERT PARTY
[YES] / NO	Y [ REQUEST COPY ] [ (YES) NO ]	(YES / NO	] (YES) / NO	J YES (NO), ]
FOR MYERS DC	CORPORANDY <u>C</u>	HUEY	KIRSCH	AJOHNSON O
<b>8</b> /15/91	<i>8/15</i> /91	8/15/91	8/5/91	8/15/91
[ YES / (NO)	[ REQUEST COPY ]	]		
ZIMMERMAN RPZ	<u> </u>			
8/16/91				

[COPY TO: \_OCS [ YES/NO