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 BOUCHEY, G.D. Washington Public Power Supply System  
 RECIPIENT NAME RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 911121 ltr re violations noted in Insp Rept  
 50-397/91-35 on 910918-1022. Corrective actions: plant  
 procedures for main steam sys changed to allow opening of  
 valves in support of operation at less than 5% power.

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December 20, 1991  
G02-91-234

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 91-35  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated November 21, 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. Bouchéy for GDB*

G. D. Bouchéy, Director  
Licensing & Assurance

REF/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

During an NRC inspection conducted on September 18 - October 22, 1991, 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 (1991), the violation is listed below:

Section 6.8.1 of the Technical Specifications states, in part: "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, includes the following among safety-related activities for which procedures are recommended:

"2. General Operating Procedures

- "a. Cold Shutdown to Hot Standby
- b. Hot Standby to Minimum Load (nuclear startup)"

Plant Procedures Manual (PPM) 3.1.2, Revision 20, "Reactor Plant Cold Startup," paragraph 4.21 stated:

"MS-V-16, MS-V-19, and MS-V-67A, B, C, D shall be closed whenever reactor power is GE [greater than or equal to] 5% to prevent potential iodine release during accident conditions. These valves shall remain closed until the Reactor is in Mode 4, unless either of the following exceptions are in effect:

- Directed otherwise by Emergency Operating Procedures.
- These valves are required to be open to equalize pressure across the MSIV's following a scram."

Contrary to the above, on September 29, 1991, during plant startup from Mode 4, MS-V-16 and MS-V-19 were closed before exceeding a power level in excess of 5% and later after reducing power below 5% the valves were reopened with the reactor still in Mode 2 (Startup/Hot Standby), and with neither of the stated exceptions in effect.

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



### Validity of Violation

The Supply System acknowledges the validity of this violation. The root cause for the violation was the Procedure was Less Than Adequate because the Instructions were Incomplete. The caution statement for operation of the valves contained within the body of the Reactor Plant Cold Startup procedure (PPM 3.1.2) did not include the reactor mode limitation, i.e., Mode 4. Development of the caution statement neglected the possibility of reducing reactor power within the startup procedure, which is allowed on a limited basis. A contributing cause for the violation was the Procedure Not Followed because the Plant Operator failed to refer to the Precautions and Limitations section of the procedure for the complete list of operating restrictions for the valves prior to opening MS-V-16 and MS-V-19. A second contributing cause for the violation was that the Procedure was Less Than Adequate because it Did Not Cover the Situation. The procedure did not allow for special operation of the valves in order to support troubleshooting of selected Plant equipment at the appropriate Plant conditions. In this case, MS-V-16 and MS-V-19 needed to be opened to check for packing leaks on a Main Steam drain valve, MS-V-20, during Mode 2 while less than 5% power. Analysis did support the opening of the valves under the conditions.

### Corrective Steps Taken/Results Achieved

- 1) The guidance statements in the body of Reactor Plant Cold Startup (PPM 3.1.2) procedure was changed to include all of the restrictions and exceptions associated with operation of MS-V-16 and MS-V-19.
- 2) The Plant procedures for the Main Steam System (PPM 2.2.6), Reactor Plant Cold Startup (PPM 3.1.2), Reactor Plant Startup From Hot Shutdown (PPM 3.1.3), Normal Shutdown to Cold Shutdown (PPM 3.2.1) and Normal Shutdown to Hot Shutdown (PPM 3.2.2) were changed to allow opening of the valves in support of special Plant operations at less than 5% power in any mode. They were also changed to allow valve operability testing per the Technical Specification surveillance procedure PPM 7.4.0.5.6 (RWCU, HPCS, LPCS, RCIC, MS, & RCC Valve Operability) provided only one valve (MS-V-16 or MS-V-19) is opened at a time and they are opened in a specified sequence.
- 2) The above described procedures were also changed to require a Problem Evaluation Request (PER) be generated any time the valves are stroked with the reactor in Modes 1, 2, or 3 to track the number of thermal cycles imposed on the valves. This was always the intent, but was not adequately covered in the original procedure change.





Corrective Action to be Taken

- 1) This response will be made required reading for the Control Room Operators.
- 2) The Plant Operations management will review this incident with the Control Room Operators during their Reactor Operator Requalification training and emphasize the need to review the Precautions and Limitations section of the procedures.
- 3) An engineering evaluation is being performed to assess the thermal stress to piping and valves when MS-V-16 and MS-V-19 are stroked one at a time and in a certain sequence. If the evaluation determines that the thermal fatigue imposed on the associated piping and valves is negligible when the valves are opened during Modes 1, 2, or 3 in this manner, the requirement to generate a PER to track the number of thermal cycles under these conditions will be deleted from the appropriate procedures.

Date of Full Compliance

Full compliance will be achieved prior to reactor restart from the R7 refueling and maintenance outage.

