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SUBJECT: Responds to NRC 920630 ltr re violations noted in insp rept 50-397/92-14 on 920420-0531.Corrective actions:programs at selected other plants will be reviewed to obtain understanding of details of matl control programs.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 30, 1992
G02-92-181

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 92-14
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 30, 1992. 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.

Sincerely,

L. L. Grumme, Acting Director
Licensing & Assurance (Mail Drop 280)

DAS/bk

Attachments

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

A001

APPENDIX A

During an NRC inspection conducted on April 20 - May 31, 1992, 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, that "Written procedures shall be established, implemented, and maintained covering....c. Refueling operations."

WNP-2 Plant Procedure Manual (PPM) 1.3.18, Revision 6, "Tools and Equipment Accountability Control Around Open Plant Systems," Section 5.1.2, states, in part, "From RPV head lift to RPV head reseat, the Refuel Floor Security Officer will:

a. Monitor foreign materials passing the barricaded area boundary...and ensure each item is logged."

Section 5.1.5 of the above PPM states, in part: "Prior to passing into the barricaded area, inspect all...equipment for...proper capture. Correct faulty fasteners or provide capture for any questionable condition."

Section 4., Precautions and Limitations, NOTE, in the above PPM states, in part: "Capture may be accomplished using lock wire,...lanyards, duct tape, rope, etc."

Contrary to the above, on May 7, 1992, two rolls of tape and a radiation survey instrument on the refueling bridge had not been logged into the Foreign Materials Accountability Log, and several items on the refueling bridge were not captured, including a pen, an extension cord, electronic equipment, and an aerosol can.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The process for controlling the material accountability in the refueling cavity was changed for the 1992 maintenance and refueling outage, R7. This modified process did not adequately address material control responsibility on the refueling platform and the result was less than adequate control as documented in this Notice of Violation.

In April 1992 procedure PPM 1.3.18, Tools and Equipment Accountability Control Around Open Plant Systems, was revised in an effort to better define material control within the refueling cavity. This revision changed the responsibilities of personnel regarding materials control in and around the refueling cavity when the reactor head is removed. Previously, the individual workers and their direct supervisors were responsible for material control within the cavity. It is implied, although not specifically delineated in the revised procedure, that the Refueling Floor Supervisor is responsible for overall refueling cavity material accountability. The Refueling Floor Supervisor is tasked by the PPM with the review of the materials log.

PPM 1.3.18 assigned the Refuel Floor Security Officer the responsibility for maintaining the material log and ensuring each item is logged. However, a separate Security Department procedure, also revised in April 1992, contained a requirement to maintain the materials log only when the cavity was not flooded up. The Security procedure also states that individuals taking materials into the cavity area are responsible for logging materials, although the Security officer may assist by making the log entry. Thus, responsibility for the materials log, particularly during refueling platform activities, was not clearly defined.

The Refueling Floor Supervisor is responsible for coordination of many of the activities related to the reactor refueling. Material accountability is one portion of the overall job scope. Although PPM 1.3.18 addresses material control within the reactor cavity and the physical condition of the refueling platform, it does not specifically address the control of materials on the refueling platform. This lack of defined responsibility led to the condition cited in the violation.

The root cause for this violation was less than adequate change management. The changed procedures did not include the necessary controls to account for the newly assigned personnel responsibilities and department interactions created by the procedures. The responsibility for material accountability within the reactor cavity was transferred, as delineated in PPM 1.3.18, from the personnel performing the work to other individuals. Responsibilities were not clearly defined for materials on the refueling platform.

Corrective Steps Taken/Results Achieved

Upon notification of material control concerns by Supply System Quality Assurance personnel, efforts were made during the outage to improve personnel awareness of the control of material within and above the refueling cavity. Since this violation was not received until after refueling activities were completed, no additional actions were initiated after receipt of this violation.

Corrective Action to be Taken

The Plant Technical department will review programs at selected other plants to obtain an understanding of the details of successful programs. Appropriate Supply System procedures will be modified to include those aspects of other reviewed programs necessary to ensure material control within the reactor cavity is maintained. These changes will be completed by April 1, 1993, which is prior to the next scheduled maintenance and refueling outage.

Date of Full Compliance

Although it is not possible to determine the exact time full compliance was achieved relative to materials control within the reactor cavity, an inspection of the refueling cavity area verified that the Plant was in full compliance prior to entry into Operational Condition 4 on June 27, 1992.