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 AUTH.NAME AUTHOR AFFILIATION
 SORESENSEN,G.C. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
 MARTIN,J.B. Region 5 (Post 820201)

SUBJECT: Responds to NRC 930112 Enforcement Conference re violations
 noted in insp rept 50-397/92-41. Corrective actions:RW
 personnel did not enter "0" values but entered positively
 identified nuclides & allowed computer codes to be used.

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February 11, 1993
G02-93-030

Docket No. 50-397

Mr. J. B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane
Walnut Creek, CA 94596-5368

Dear Mr. Martin:

Subject: **WNP-2, OPERATING LICENSE NPF-21**
NRC INSPECTION REPORT 50-397/92-41

At the conclusion of the January 12, 1993 Enforcement Conference held in the NRC regional office to discuss the subject inspection report findings, Mr. Faulkenberry requested that the Supply System provide specifics on areas where the Supply System felt that the report required clarification. The attachment to this letter provides the requested information.

In addition, the material provided to the NRC at the January 12 Enforcement Conference provided details on each of the apparent violations and the Supply System's basis for concluding that certain of the apparent violations were not, in our view, violations of NRC regulations or Supply System Technical Specifications, Policies or Procedures.

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Page Two
NRC INSPECTION REPORT 50-397/92-41

We appreciated the opportunity to meet with members of your staff and provide our perspective on the issues raised in the subject inspection report. As stated in the enforcement conference, the issues raised in the inspection report are of concern to us and we are taking aggressive actions to resolve the issues. We expect that our performance in the forthcoming refueling outage (R-8) and ensuing reactor startup will reflect the results of the actions we have been taking to improve procedural compliance in all areas, including adherence to health physics policies.

Sincerely,

Alan Sorensen
G. C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

GCS/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC
R Copeland - Siemens
DL Williams - BPA/399
NRC Site Inspector - 901A



ATTACHMENT

The following items reflect areas where the Supply System feels clarification to NRC Inspection Report 50-397/92-41 is needed:

- 1) Page 4, first paragraph, states: *"The audit identified approximately 90 adverse findings in this area,..."*

Supply System comment: The report by our consultant, Mr. Deltete contained 91 recommendations, many of which were organization and efficiency related and were not characterized as "adverse findings".

- 2) Page 4, seventh paragraph, states: *"As one example, an HP technician involved in RW activities was not properly trained or qualified."*

Supply System comment: The HP technician was properly trained and qualified to perform a survey, the task he was sent to perform. He was not trained or qualified to perform radwaste shipping, nor was he asked to perform this task.

- 3) Page 5, item (d)(ii) states: *"One of the HP supervisors had not received training in accordance with IEB 79-19."*

Supply System comment: The HP supervisor had received training in accordance with IEB 79-19 as a technician prior to his promotion to supervisor. However, retraining was not current.

- 4) Page 8, second paragraph of item (b)(ii) states: *"RW personnel did not review MDA results, nor did anyone assess whether the LLD achieved for directly measured radionuclides was reasonable pursuant to the BTP."*

Supply System comment: We believe the LLD's achieved were consistent with the BTP and standard industry practice. They were reviewed in establishing our classification program to ensure they were adequate to meet regulatory requirements.

- 5) Page 9, second paragraph of item (b)(iii) states: *"...RW personnel had entered "0" as the concentration...."*

Supply System comment: RW personnel did not enter "0" values, they entered the positively identified nuclides and allowed the computer code's default value (0) to be used.



- 6) Page 9, item (iv) states: *"...licensee's RW personnel...had insisted that WNP-2, as a matter of policy, did not use secondary ratios for waste classification."*

Supply System comment: RW personnel stated that second order scaling was not routinely used, as a matter of practice, (not policy).

- 7) Page 9, item (v) last two sentences state: *"...the CS-137 LLD had been approximately...these LLDs had been unacceptably high in relation to the BTP-referenced values...."*

Supply System comment: The values quoted are MDAs, not LLDs. We believe that the a priori LLDs do meet the BTP guidance.

- 8) Page 10, second paragraph of item (vii) states: *"These condensate resin samples showed Ce-144 concentrations slightly higher...."*

Supply System comment: As reported at the enforcement conference, the apparent Ce-144 in the Condensate resin samples was determined to be from a misidentified minor peak of La-140. Therefore, there was no significant shift in concentrations, and classification of liner 338 would still have been incorrect had MDA values for Ce-144 been used. (Note that the information related to the minor peak of La-140 was not available when the inspection report was prepared.)

- 9) Page 11, item (c)(ii) states: *"...Prerequisite 4.2, requires that the waste classification will be determined prior to using the shipping cask for RW shipments...the licensee had been unable to comply with this prerequisite...."*

Supply System comment: The Supply System has applied this prerequisite as requiring the waste to be classified prior to using the cask for RW shipments, not prior to use. Thus the prerequisite was met for this and all other shipments.

- 10) Page 11, item (d)(i) states: *"The chemistry laboratory analyses of samples 5750 and 5751 had not achieved an acceptable LLD as described in the BTP."*

Supply System comment: As discussed previously in items (4) and (7) above, we believe that an acceptable LLD was achieved as described in the BTP.

- 11) Page 11, item (d)(ii) states: *"The practice of entering '0' for scaling radionuclides with no accompanying evaluation of MDA indicated either carelessness or a lack of understanding of the BTP and 10CFR61.55."*

Supply System comment: As discussed at the enforcement conference, zero's were not "entered" by the RW personnel, but were allowed to be used as default values by the computer code. Plant RW staff have a clear understanding of the BTP and 10CFR61.55 and are not careless in the performance of their duties related to classification of waste.



- 12) Page 12, item (iv) states: *"The presence of Cs-137 and Ce-144 in unusually high concentrations...The licensee had not analyzed the reason for the abnormal levels of Cs-137 and Ce-144 in the condensate resin."*

As noted above (item 8), the Ce-144 was actually a misidentified peak of La-140.

- 13) Page 12, third paragraph states: *"...failure to classify the waste for shipment 92-61-02 prior to using the shipping cask for RW shipments...."*

The waste for shipment 92-61-02 was classified prior to using the cask for a RW shipment.

- 14) Page 17, third paragraph states: *"...periodicities were not included in the procedure."*

The frequency (periodicity) for performing a procedure is maintained in our Scheduled Maintenance System, not in the procedure itself.

- 15) Page 21, fifth paragraph under Timeline states: *"...he became so disruptive that the instructor finally called his supervisor."*

This sentence should be revised to read *"...the instructor finally called her. (the instructor's) supervisor."*

- 16) Page 21, last line and page 22 first line states: *"An NRC inspector observed an auxiliary operator enter...."*

The Supply System designation is an "equipment operator" versus an "auxiliary operator".

- 17) Page 24, item (c) states: *"...the licensee's program for recording dose depended on...."*

It is our program for daily dose control, not our program for recording dose that was at issue. Our program for recording doses comes from analysis of workers' TLD's, not the pencil dosimeters which are used for recording the daily dose information on the REC cards.

During the Enforcement Conference, there were questions about the composition of the Incident Review Boards (IRB) which the Supply System convenes to investigate plant events. An IRB is convened to immediately investigate WNP-2 Plant events where human performance is suspected to be a main contributor. The IRB Chairman is a rotating duty position assigned on a weekly basis by the Plant Manager. Eligible personnel are department managers within the Plant and Quality Assurance organizations. The chairman then selects the appropriate board membership. Minimum size of the IRB is the chairman and the "Duty Event Analysis Engineer", who is trained in root cause and Human Performance Enhancement System (HPES) techniques. Since the IRB chairman is determined by a weekly rotation, it is expected that the chairman will, due to the random nature of this assignment, be independent from the organization involved in the event. Through questions raised in the inspection report, a further review of the IRB process has caused us to consider the need to make the following two changes to the IRB process:

- 1) Develop a two-tier IRB to address the following issues:
 - Low-level issues should be reviewed and documented by line-management who are trained in HPES.
 - Significant issues as presently described in the purpose statement of PPM 1.1.8 "Incident Review Board".
- 2) For those items which reach the category of "significant", ensure that there is organizational independence on the IRB. That is, ensure that at least one member (other than the Duty Event Analysis Engineer) is not from the organization whose functional area is being evaluated.

