



WASHINGTON PUBLIC POWER SUPPLY SYSTEM RECEIVED

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REGION V

September 13, 1993  
G02-93-233

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 93-15  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 16, 1993. 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,

J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

KBL/bk

Attachments

cc: BH Faulkenberry - NRC RV  
NS Reynolds - Winston & Strawn  
JW Clifford - NRR  
DL Williams - BPA/399  
NRC Site Inspector - 901A

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## Appendix A

During an NRC inspection conducted on June 28 - July 2, 1993, 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, the violations are listed below:

- A. 10 CFR 50.54, "Conditions of licenses," paragraph (i-1), requires that "...the licensee shall have in effect an operator requalification program which must as a minimum, meet the requirements of [Section] 55.59(c) of this chapter."

10 CFR 55.59(c)(1) requires that, "The requalification program must be conducted for a continuous period not to exceed two years, and upon conclusion must be promptly followed, pursuant to a continuous schedule, by successive requalification programs."

Contrary to the above, on June 30, 1993, NRC inspectors identified that:

The licensee did not establish a continuous schedule for the 1993-1994 two year training period for licensed operator requalification training in that for the first two training cycles (January through March) of 1993, no two year training plan had been drafted. In addition, the two year training plans for 1991-92 and 1993-94 were not approved by plant management.

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

### Validity of Violation

The Supply System admits the validity of this violation. The root cause of the failure to establish an approved, continuous schedule for the 1993-1994 License Operator Requalification (LORQ) training period was less than adequate (LTA) risk assessment.

After the programmatic failure of the LORQ training program in February 1991 and subsequent shutdown of the plant, training management judiciously placed significant emphasis on correcting related programmatic training deficiencies, assisting in improving plant Emergency Operating Procedures (EOPs), requalifying operating crews for plant restart, and regaining control of the LORQ training program. From the time of the programmatic failure, previous training management knew that an approved two-year training plan did not exist; however, considering the importance of developing and implementing an adequate LORQ program to requalify operators for plant restart, the risk of not developing a two-year plan during this time period was judged by management to be minimal. Once the LORQ program was initially revised and the plant restarted with requalified operators, training management failed to recognize the elevated risk in continuing to train without an approved plan, despite several warnings from independent evaluations, auditing bodies, and line management. Additionally, in August 1992, funding was available for contracting General Physics to develop a two-year plan, but the decision was made to use this funding on other General Physics training activities without developing a plan.



The LORQ training department organizational structure and composition was changed extensively in June 1992. In January 1993, the new LORQ training management contracted General Physics to develop a two-year plan; however, training management didn't recognize the need to obtain formal approval of the entire draft. Although training management correctly focused attention on preparing license candidates for upcoming NRC exams, training management did not adequately assess the risk of operating training without a formally approved plan.

The Supply System agrees that operating the LORQ program without an approved two-year plan represented a deviation specifically from Technical Training Manual procedure TTM 5.3.2 (LORQ Program Description), which required Plant Operating Committee (POC) and specific plant management's approval of such deviations. However, item 3.c.(2), Evaluation Details of NRC Inspection Report 50-397/93-015, states in part that the Licensee representatives acknowledged the NRC's observation that "deviations from the plan (such as training conducted in training cycles 93-1 and 93-2)" must be approved by the Plant Operating Committee (POC). This is not the Supply System's interpretation of the procedure. The training content of training cycles 93-1 and 93-2 was approved by plant management and that decision was documented in a memo dated January 22, 1993, from the Operations Training Manager to the Plant Manager. ??

#### Corrective Steps Taken/Results Achieved

1. On July 1, 1993, training management approved and implemented a two-year plan which reflected the variance in the first two training cycles of 1993 and incorporated missed training into future training cycles within the two-year range.
2. Technical Training procedure TTM 5.3.2 has been revised to delete the requirement for POC to approve revisions to the LORQ program description. The revised procedure was fully approved on September 9, 1993. Revisions to TTM 5.3.2 itself will continue to be approved by appropriate plant management.

#### Corrective Action to be Taken

No further corrective action is required.

#### Date of Full Compliance

The Supply System was in full compliance with 10 CFR 55.59(c)(1) when the 1993-1994 training plan was approved and implemented on July 1, 1993.



- B. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.

WNP-2 Administrative Procedure PPM 1.3.15, Plant Problems - Plant Problem Reports, states that Problem Evaluation Reports (PER) are used to formally communicate the existence of a plant problem to Plant Management for action.

A report by United Energy Services Corporation (UESC), Update Report on Technical Training Effectiveness Review, dated January 27, 1993, stated that the previous UESC training review report had identified that an approved two year training plan for licensed operators did not exist for 1991-92 and that during the current audit there was still no approved two year plan for 1993-94.

On July 1, 1993, NRC inspectors identified that no PER or other controlled document existed to formally communicate this finding to licensee management for action.

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

#### Validity of Violation

The Supply System admits the validity of this violation. The root cause of the failure to use the PER process (Plant Procedure PPM 1.3.12, Plant Evaluation Request (PER), Revision 17) or other controlled documents to formally communicate the lack of an approved two-year plan to licensee management for action was the failure of training management to implement a centralized, formal commitment tracking system.

An outside auditor found the requalification program operating without a two-year plan, but no PER or other formal mechanism was used to track this finding. The audit referenced in this finding was conducted by United Energy Services Corporation in January 1993. This audit was commissioned by the Supply System Executive Board of Directors, and the finding was reported to this body. The finding was then transmitted from upper management to line management.

The corrective action associated with this finding was being tracked using the Technical Training Division portion of the Supply System Business Plan. Within that plan was a commitment to have a draft two-year plan in place by March 1993 with an approved two-year plan in place prior to June 30, 1993. While the Business Plan is a formal document that provides milestones and focus on actions, it does not constitute a formal tracking system and was inappropriate for use in this instance.





Corrective Steps Taken/Results Achieved

On July 14, 1993, the Training Department approved and implemented an Action Commitment Tracking System (ACTS). This system is governed by training procedure TTP 6.10.5. In part, ACTS tracks the need to review and modify the two-year plan. Additionally, the evaluation of training needs (for example, plant modifications, plant management input, and operating events) is tracked and results are incorporated as appropriate into the two-year plan. One individual has been assigned responsibility for maintaining the two-year plan current. That individual reviews the plan at the conclusion of each training cycle. This system, and the assignment of responsibility, should prevent a recurrence of the requalification program operating without a two-year plan.

Corrective Action to be Taken

TTM 6.10.5, Action Commitment Tracking System (ACTs), will be revised by October 15, 1993, to require ACTS inputs to be evaluated against PPM 1.3.12, Plant Evaluation Request (PER), for PER Applicability.

Date of Full Compliance

The Supply System will be in full compliance with 10 CFR 50, Appendix B, Criterion XVI on October 15, 1993, when TTM 6.10.5, is revised.

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 procedure TTM-5.3.2.

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