

NOTICE OF VIOLATION

Washington Public Power Supply System
WNP-2

Docket No. 50-397
License No. NPF-21

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).

- 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).



With respect to Items A and B, pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 16th day of August 1993

EXECUTIVE SUMMARY

At the conclusion of this inspection, the inspection team concluded that the licensee had implemented a Systems Approach to Training (SAT) in the operator licensing, equipment operator, and chemistry technician training areas. The following weaknesses were observed:

- o The 1991-92 and 1993-94 two year plans had been implemented, but had not been approved; a draft plan was presented to NRC as the plan that was being used in 1993. The draft plan was not followed during the first two training cycles of 1993 (93-1 and 93-2). These cycles focused almost exclusively on EOP training in order to implement the Phase II EOPs.
- o The decision to deviate from the draft two year training plan was not formally approved by plant management. Technical Training Manual (TTM) procedure 5.3.2, WNP-2 Licensed Operator Qualification Program Description, requires that revisions to the licensed operator requalification program must be approved by the Plant Operations Committee (POC). There was no POC approval of planned deviations from the requalification program in 1993.
- o Tracking of significant findings identified by the January 1993 Board of Directors audit was ineffective. Lack of a two year plan was identified during this special internal audit in January, 1993. In response to this audit finding, the Training Department agreed to have this plan in place by March 1993, but did not initiate a problem evaluation report. As noted above, this plan was still unapproved when presented to the NRC inspection team in June 1993.
- o While this inspection was in progress, the Training Department failed to track licensed operator license renewal dates. After the NRC identified the licensee's need for license renewals, the facility submitted renewal requests which were, by then, untimely (less than 30 days before license expiration).
- o Many new tasks for reactor operators and senior reactor operators existed which required significant changes to the training program. The licensee identified this weakness in December 1992. The licensee considered that training was already being conducted on the most important of these items, but committed to review all tasks for possible accelerated implementation into the training program.
- o Staffing levels did not seem to account for turnover and inefficiencies caused by new personnel coming into the department. Training department overtime averaged 20% during the last year; 28 people have left the department since 1991 (about 50% annual turnover).