

U.S. NUCLEAR REGULATORY COMMISSION
REGION V

Report No. 50-397/93-46
Docket No. 50-397
License No. NPF-21
Licensee: Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352
Facility Name: Washington Nuclear Project No. 2 (WNP-2)
Inspection at: WNP-2 Site near Richland, Washington
Inspection Conducted: November 1-5, 1993
Inspector: W. J. Wagner, Reactor Inspector

Approved by: W. P. Ang for 12/1/93
W. P. Ang, Chief Date Signed
Engineering Section

Inspection Summary:

Inspection during the period of November 1-5, 1993 (Report No. 50-397/93-46)

Areas Inspected: This routine, announced inspection reviewed the licensee's Quality Assurance (QA) activities with emphasis on audit preparation and performance. Inspection Procedure 35702 was used as guidance for this inspection.

Results:

General Conclusions and Specific Findings:

Improvement of QA auditing activities was noted during the inspection.

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Safety Issues Management System (SIMS) Item:

None

Significant Safety Matters:

None

Summary of Violation or Deviations:

None.

Open Items Summary:

None.

DETAILS

1. Persons Contacted

Washington Public Power Supply System

- *J. Benjamin, Manager, Quality Assessment
- G. Brastad, Consulting Engineer
- *A. Carlyle, Principal QA Engineer
- *D. Coleman, Regulatory Services Supervisor
- *W. Davison, Manager, Plant Support Assessments
- *C. Fies, Licensing Engineer
- *M. Flasch, Director of Engineering
- *A. Hosler, Manager, Licensing
- D. Kerlee, Principal QA Engineer
- *C. Mackaman, Licensing Engineer
- *M. Monopoli, Manager, Maintenance
- *J. Muth, Manager, Plant Assessments
- *J. Rhoads, Acting Manager, Quality Support
- *W. Shaeffer, Manager, Operations
- *R. Webring, Manager, Technical Division
- *J. Wyrick, Manager, Maintenance Engineering/Planning

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- *R. Barr, Senior Resident Inspector

*Denotes those attending the exit meeting on November 5, 1995

The inspector also held discussions with other licensee personnel during the course of the inspection.

2. Quality Verification (35702)

Previous NRC Inspection Reports 50-397/93-33 and 50-397/93-08 identified that QA audit reports were not issued in a timely manner, and audit records failed to include written marked up procedures or checklists. The inspector reviewed recent licensee QA audits to assess whether licensee performance in the preparation and performance of auditing activities had changed.

a. Organization

The licensee's QA organization was realigned in September 1993. Under the new realignment, the QA organization consisted of two Divisions: Quality Assessments and Quality Support. The Quality Assessments Division performs the independent oversight functions involving the technical assessments, surveillances and audits previously performed by the Nuclear Safety Assurance Division, Programs and Audits Division and Operational Assurance Programs

Division. The licensee completed their 10 CFR 50.59 review of the QA organization realignment on September 13, 1993. The 10 CFR 50.59 review concluded that a Safety Evaluation was not required to implement the QA Program changes under the organizational realignment. The inspector reviewed the Safety Evaluation and was satisfied that the QA organizational realignment did not involve an unreviewed safety question or a change in technical specifications. In addition, the inspector concluded that the QA organizational changes continued to meet the QA requirements of 10 CFR 50, Appendix B.

b. Audit Preparation, Performance and Reporting

The inspector compared the current audits to the audits performed prior to the realignment of the QA organization in September 1993. The inspector reviewed these audits for evidence of compliance with 10 CFR 50 Appendix B, Criterion XVIII, "Audits." To satisfy Criterion XVIII the licensee committed to comply with Regulatory Guide 1.144, Revision 1, "Auditing of Quality Assurance Programs for Nuclear Power Plants." Regulatory Guide 1.144 endorsed American National Standards Institute (ANSI) standard ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." The inspector reviewed the following eight audits that were performed during 1993 for compliance with ANSI N45.2.12-1977 requirements for audit preparation, performance and reporting:

- .. Audit 93-611 - Emergency Preparedness Program
- Audit 93-612 - Corrective Action Program
- Audit 93-613 - Instrumentation, Maintenance & Calibration Facility
- Audit 93-615 - Fire Protection Audit
- Audit 93-616 - Corrective Action Program
- Audit 93-642 - Technical Specifications
- Audit 93-643 - Security
- Audit 93-645 - Fitness-For-Duty Program

The first five audits reviewed, 93-611 through 93-616, were initiated prior to the realignment of the QA organization. The inspector noted that two of these five audits, 93-615 and 93-616, did not meet the requirements of ANSI N45.2.12, Section 4.2.1. Section 4.2.1 required that individual audit plans identify the audit scope, the requirements, the activities to be audited, the organizations to be notified, the applicable documents, the schedule, and include written procedures or checklists. The audit plans for Audits 93-615 and 93-616 performed on April 12 and May 10, 1993, did not identify the organizations to be notified nor include the written procedures or checklists to be used. A similar problem, regarding the failure to include checklists or procedures in the audit records, had been identified and documented in NRC Inspection Report 50-397/93-08 dated March 31, 1993. The latter resulted in an NRC non-cited violation, and a licensee Quality Finding Report (QFR) 93-010 to address the checklist issue. The inspector found that full compliance with QFR 93-010 was not

achieved until after initiation of Audit 93-616. The inspector's review of the audits performed during and after the realignment of the QA organization in September 1993 revealed an improvement in the auditing program. The audits reviewed, 93-642, 643 and 645, had audit plans which included the checklist and identified the organization to be audited.

The inspector was also concerned with the duration of some of the earlier audits. For example, Audit 93-615 was conducted during the period of April 12 through November 1, 1993 (29 weeks), and Audit 93-616 was conducted during the period of May 10 through August 25, 1993 (15 weeks). The inspector considered that 15 to 29 weeks was an unreasonable amount of time to perform an assessment whose purpose was to inform senior management on the effectiveness of specific activities of the QA Program. However, the inspector observed that Problem Evaluation Requests (PERs) were issued immediately upon identification of any problems. Additionally, the inspector found that auditors were repeatedly removed from these audits to perform other plant duties causing them to lose focus upon return to the audit. The inspector also noted that there were no interim audit management debriefs during these audits. The inspector's review of the later audits, performed since the realignment of the QA organization, revealed that the audits were completed in a timely manner (i.e., within 2-3 weeks). The inspector was satisfied that the licensee had taken appropriate actions to avoid problems associated with lengthy audits.

The inspector noted another area in which apparently unnecessary delays in problem identification were introduced into the licensee's auditing process. Specifically, in Audit 93-615, the inspector noted that an audit team member, who was an independent consultant, performed an audit for five days and then left the WNP-2 site without providing an audit report to the team leader until six weeks later. The licensee stated that the audit report was submitted to the team leader without review or consultation with the team leader. The auditor's report raised questions regarding WNP-2 compliance to Appendix R requirements. The inspector noted that the auditor's questions could have been addressed during the audit had the licensee required the auditor's report prior to leaving WNP-2. The licensee's QA organization was planning on addressing the auditor's questions in the scope of the Appendix R audit scheduled for the spring of 1994. The inspector's concern was resolved when the QA management policy was subsequently revised to require independent consultant audit team members to submit and discuss their audit report with the audit team leader prior to leaving the site. The inspector considered the licensee's actions to be adequate.

c. Conclusions

Subsequent to realignment of the QA organization in September 1993, the planning, scheduling and reporting of QA audits had improved. The audits performed after September 1993 met NRC regulatory standards.

No violations or deviations of NRC requirements were identified.

3. Exit Meeting

The inspector met with the licensee management representatives noted in Paragraph 1 on November 5, 1993. The scope of the inspection and the inspector's findings were discussed. Licensee representatives acknowledged the inspector's findings.

The licensee did not identify as proprietary any of the information provided to, or reviewed by, the inspector during this inspection.