



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

September 16, 1999

Mr. J. V. Parrish (Mail Drop 1023)
Chief Executive Officer
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

SUBJECT: MIDCYCLE PLANT PERFORMANCE REVIEW (PPR) - WNP-2

Dear Mr. Parrish:

On August 18, 1999, the NRC staff completed the midcycle Plant Performance Review (PPR) of WNP-2. The staff conducts these reviews for all operating nuclear power plants to integrate performance information and to plan for inspection activities. The focus of this performance review was to identify changes in performance over the past 6 months and to allocate inspection resources for the next 7 months.

We did not identify any areas in which your performance warranted additional inspection effort beyond the core inspection program. Based on this review, we plan to conduct only core inspections at your facility over the next 7 months.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were considered during this PPR process to arrive at our integrated review of licensee performance trends. The PIM includes items summarized from inspection reports or other docketed correspondence between the NRC and Energy Northwest from October 1, 1998, to July 16, 1999. As noted above, greater emphasis was placed on those issues identified in the past 6 months during this performance review. The NRC does not attempt to document all aspects of licensee programs and performance that may be functioning appropriately. Rather, the NRC only documents issues that it believes warrant management attention or represent noteworthy aspects of performance.

This letter advises you of our plans for future inspection activities at your facility so that you will have an opportunity to prepare for these inspections and to provide us with feedback on any planned inspections that may conflict with your plant activities. Enclosure 2 details our inspection plan through March 2000. This date was chosen to coincide with the scheduled implementation of the revised reactor oversight process in April 2000. Routine resident inspections are not listed because of their ongoing and continuous nature.

9909240092 990916
PDR ADDCK 05000397
G PDR

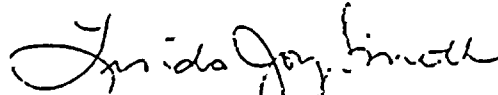
MAY

Energy Northwest

-2-

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Linda Smith at (817) 860-8137 with any questions you may have.

Sincerely,



Linda J. Smith, Chief
Project Branch E
Division of Reactor Projects

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

Enclosures:

1. Plant Issues Matrix
2. Inspection Plan

cc:

Chairman
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Washington 98504-3172

Mr. Rodney L. Webring (Mail Drop PE08)
Vice President, Operations Support/PIO
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

Mr. Greg O. Smith (Mail Drop 927M)
Vice President, Generation
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

Mr. D. W. Coleman (Mail Drop PE20)
Manager, Regulatory Affairs
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

Energy Northwest

-3-

Mr. Albert E. Mouncer (Mail Drop 1396)
General Counsel
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

Mr. Paul Inserra (Mail Drop PE20)
Manager, Licensing
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

Perry D. Robinson, Esq.
Winston & Strawn
1400 L Street, N.W.
Washington, D.C. 20005-3502

Bob Nichols
State Liaison Officer
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, Washington 98504-3113

John L. Erickson, Director
Division of Radiation Protection
Department of Health
Airdustrial Center Building #5
P.O. Box 47827
Olympia, Washington 98504-7827

Max E. Benitz, Jr., Chairman
Board of Benton County Commissioners
P.O. Box 190
Prosser, Washington 99350

Sue Miller, Chair
Board of Franklin County Commissioners
1016 North 4th Street
Pasco, Washington 99301

bcc to DCD (IE40)

bcc distrib. by RIV:

- | | |
|---|------------------------------|
| Regional Administrator | Resident Inspector |
| DRP Director | DRS Branch Chiefs (3 copies) |
| DRS Director | RITS Coordinator |
| Branch Chief (DRP/E) | RIV File |
| Senior Project Inspector (DRP/E) | Branch Chief (DRP/TSS) |
| Chief, NRR/DISP/PIPB | Chief, OEDO/ROPMS |
| B. Henderson, PAO | C. Gordon |
| T. Boyce, NRR/DISP/PIPB | Records Center, INPO |
| C. Hackney, RSLO | |
| W. D. Travers, EDO (MS: 16E15) | |
| Associate Dir. for Projects, NRR | |
| Associate Dir. for Insp., and Tech. Assmt, NRR | |
| PPR Program Manager, NRR/ILPB (2 copies) | |
| Chief, Inspection Program Branch, NRR | |
| Chief, Regional Operations and Program Management Section, OEDO | |
| S. Richards, NRR Project Director (MS: 13D1) | |
| J. Cushing, NRR Project Manager (MS: 13E16) | |
| Chief, NRR/DIPM/IIPB | |

11

DOCUMENT NAME: S:\PPR 99-02\Letters\WNP

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

RIV:SPE:DRP/E	C:DRP/E	D:DRS	D:DRP	RECONCUR
GAPick:ljb	LJSmith	ATHowell	KEBrockman	LJSmith
09/1/99	09/1/99	09/1/99	09/1/99	09/1/99

OFFICIAL RECORD COPY

bcc to DCD (IE40)

bcc distrib. by RIV:

Regional Administrator	Resident Inspector
DRP Director	DRS Branch Chiefs (3 copies)
DRS Director	RITS Coordinator
Branch Chief (DRP/E)	RIV File
Senior Project Inspector (DRP/E)	Branch Chief (DRP/TSS)
Chief, NRR/DISP/PIPB	Chief, OEDO/ROPMS
B. Henderson, PAO	C. Gordon
T. Boyce, NRR/DISP/PIPB	Records Center, INPO
C. Hackney, RSLO	
W. D. Travers, EDO (MS: 16E15)	
Associate Dir. for Projects, NRR	
Associate Dir. for Insp., and Tech. Assmt, NRR	
PPR Program Manager, NRR/ILPB (2 copies)	
Chief, Inspection Program Branch, NRR	
Chief, Regional Operations and Program Management Section, OEDO	
S. Richards, NRR Project Director (MS: 13D1)	
J. Cushing, NRR Project Manager (MS: 13E16)	
Chief, NRR/DIPM/IIPB	

DOCUMENT NAME: S:\PPR 99-02\Letters\WNP

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

RIV:SPE:DRP/E	C:DRP/E	D:DPS	D:DRP	RECONCUR
GAPick;ljb	LJSmith	ATHowell	KEBrockman	LJSmith
09/1/99	09/1/99	09/16/99	09/16/99	09/16/99

OFFICIAL RECORD COPY

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV

WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
06/12/1999	1999007	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: 1C Ter:	Prompt, conservative operator response to establish containment prior to moving fuel Licensee requirements for establishment of secondary containment prior to moving new fuel into the spent fuel pool in Mode 4 were unclear. Operations responded promptly and conservatively. The licensee conducted a thorough 10 CFR 50.59 safety evaluation. The resultant procedure change clarified conditions required for movement of all loads over the spent fuel pool.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/12/1999	1999007	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: 1C Ter:	In-depth, prompt investigation of valve out of position The licensee's investigation of a valve out of position was in-depth and promptly performed. The licensee identified several other problems and corrective actions in valve position verification processes. Minor tagging and clearance order process problems were also identified and corrective actions were initiated.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/12/1999	1999007	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: 1C Ter: 5B	Licensee application of shutdown TS focused on reactor safety Licensee actions with respect to interpretation and application of shutdown Technical Specifications were focused on reactor and public safety concerns. Conduct of management meetings fostered open and frank discussions that were focused on reactor safety and compliance with the intent of Technical Specification Bases.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/11/1999	1999005	Pri: OPS Sec:	NRC	NEG	Pri: 1A Sec: Ter:	Negative performance issues indicated a need for continued training focus Some negative performance issues were identified indicating that personnel performance could be improved. The negative performance issues did not show overall inadequate crew performance but reinforced the need for continued training focus. This assessment was corroborated by operators performance during recent plant events
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/11/1999	1999005	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: Ter:	Good operator control board awareness Operators monitored critical parameters well and demonstrated good control board awareness
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/11/1999	1999005	Pri: OPS Sec:	NRC	POS	Pri: 5A Sec: 5C Ter:	Effective self assessment process identified findings The licensee's self-assessment process identified worthwhile findings, and tracked and corrected them in a timely manner. However, operation's performance indicators outside those monitored by the licensed requalification program were primarily quantitative and provided limited trending data
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
05/11/1999	1999007-01	Pri: OPS Sec:	Self	NCV	Pri: 1A Sec: 3A Ter:	Violation of TS 5.4.1: failure to adequately monitor weir flow; failure to adequately monitor RX level The root cause for the inadvertent draindown of the spent fuel pool skimmer surge tank and the inadvertent draindown of the reactor pressure vessel was poor control room operator board awareness and monitoring of key parameters in the plant. This is a Severity Level IV violation of Technical Specification 5.4.1.a, with two examples, which is being treated as a noncited violation, consistent with Appendix C of the NRC Enforcement Policy, and is in the licensee's corrective action program as Problem Evaluation Requests 299-0882 and 299-1021.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/01/1999	1999004	Pri: OPS Sec:	NRC	POS	Pri: 5C Sec: Ter:	Operator responded promptly to resolve the color banding issue The inspectors' questions about the adequacy of control room instrumentation color banding were promptly addressed by the operators. In addition, the operators demonstrated a good questioning attitude and a desire to resolve the issue
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/01/1999	1999004-01	Pri: OPS Sec:	NRC	URI	Pri: 1B Sec: 4A Ter:	Adequacy of the design basis of the RHR system The design basis of the residual heat removal system did not support the full range of applicability for Technical Specification, Limiting Condition of Operation 3.4.9, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown" and the associated Technical Specification Bases. The design basis was also inconsistently implemented in procedures and in instructions for the residual heat removal system in the shutdown cooling mode of operation. Because the licensee is continuing to research the design basis for the system and because additional information is required on (1) related accident analysis assumptions, (2) generic implications, (3) prior system evaluations, and (4) notification, the issue is being identified as an unresolved item
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/01/1999	1999004-02	Pri: OPS Sec:	NRC	NCV	Pri: 5A Sec: Ter:	Failure to complete corrective actions associated with color banding of instrumentation, Corrective actions resulting from a 1996 problem evaluation request were never completed. The problem evaluation request had been generated to address the failure to resolve control room design deficiencies associated with color banding of control room instrumentation, as required by License Condition 16. The problem evaluation request was closed and the work order to resolve the color banding issue was canceled during a backlog item review, without evaluating the work order cancellation for conflict with the license condition. This problem is a violation of 10 CFR Part 50, Appendix B, Criterion XVI; however, this Severity Level IV violation is being treated as a noncited violation, and is in the licensee's corrective action program as Problem Evaluation Request 299-0745
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
04/17/1999	1999004	Pri: OPS Sec:	NRC	POS	Pri: 1B Sec: 3A Ter:	Safe and deliberate licensee performance during reactor shutdown Key managers as well as quality assurance personnel were present in the control room to monitor the shutdown, which was conducted in a safe and deliberate manner. Communications were good. Supervisory oversight and direction of the operating crew and operator performance during the shutdown were good
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/20/1999	1999002	Pri: OPS Sec:	NRC	POS	Pri: 3A Sec: 3B Ter:	Thorough and rigorous Plant Operating Committee performance The Plant Operating Committee (POC) meeting was thorough and rigorous. The diversity of committee members contributed positively to the depth and breadth of questions, and the review packages were well prepared and presented.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
03/20/1999	1999002	Pri: OPS Sec:	NRC	POS	Pri: 3B Sec: Ter:	Operators Improved In self-identification of poor work practices. Operations department personnel identified multiple occurrences of poor work planning, scheduling, and coordinating. This was recognized as an improvement in performance on the part of operators because of a conscious effort on the part of operations department management to raise the standards for performance and expectations inside the department and across the station as a whole.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/20/1999	1999002-01	Pri: OPS Sec: MAINT	NRC	NCV	Pri: 3A Sec: Ter:	Violations of TS 5.4.1: LPRM found on prohibited SFP hanger; APRM improperly returned to service; Impro A noncited violation (NRC Enforcement Policy, Appendix C) of Technical Specification 5.4.1 was identified with three examples: (1) The first example occurred when operators failed to comply with a work instruction precaution and placed a local power range monitor on a damaged spent fuel pool rack. This violation is in the corrective action program as PER 299-0470 (Section O4.1); (2) The second example occurred when the licensee failed to implement a Technical Specification surveillance procedure, which resulted in data that determined the need for an instrument gain adjust not being documented and reviewed when required. This violation is in the licensee's corrective action program as PER 299-0377 (Section M1.3); and (3) The third example occurred when maintenance technicians inappropriately left two upright ladders and an unrestrained hydraulic control unit accumulator cart immediately adjacent to safety-related equipment, which was contrary to procedures. Additionally, the technicians demonstrated poor housekeeping. This violation is in the licensee's corrective action program as PER 299-0335
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/11/1999	1999301	Pri: OPS Sec:	NRC	NEG	Pri: 3B Sec: Ter:	weak key parameter monitoring during dynamic scenarios Operators demonstrated weak key parameter monitoring related to reactor building differential pressure during the dynamic scenarios. Two to the four crews examined failed to recognize that reactor building differential pressure went positive and thus missed an Emergency Operating Procedures entry condition.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/11/1999	1999301	Pri: OPS Sec:	NRC	POS	Pri: 3B Sec: Ter:	licensing exam/test material, pass rate The 11 initial license applicants passed the examination. Operators demonstrated good communications practices, peer checks, and crew briefings. The licensee developed good test material which was adequate for administration as submitted, with only one postexamination change identified.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/06/1999	1998025	Pri: OPS Sec:	NRC	NEG	Pri: 1A Sec: Ter:	Inattention to detail missed a procedure step. The inspectors noted that operators did not initially recognize a procedure step as being required. Specifically, operators had become accustomed to performing a relatively simple repetitive procedure other than as written because of inattention to detail.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/06/1999	1998025	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: Ter:	Good operator performance during control rod exercise test During the performance of a control rod exercise test, operators demonstrated good coordination, communications, and peer checks. An operator, when presented with a procedural compliance problem, promptly notified the control room supervisor, appropriately requested authorization to use a different procedure, and initiated steps to change the subject procedure.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
02/06/1999	1998025	Pri: OPS Sec:	NRC	POS	Pri: 1B Sec: Ter:	Good operator knowledge of possible system interactions during work. Operators demonstrated good system knowledge and an awareness of ongoing work by recognizing that a reactor scram, potentially required because of a stator cooling water high conductivity, could flood the work area where personnel performed work on the circulating water system because of swell following pump shutdown. The Incident Review Board report for the deficiency identified underlying problems and was self-critical.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
12/22/1998	1998023	Pri: OPS Sec:	NRC	POS	Pri: 1B Sec: Ter:	Operators demonstrated proper safety focus for smoke issuing from a power supply Operators demonstrated a proper safety focus when responding to smoke issuing from a constant voltage supply transformer in the reactor building, in that appropriate attention and resources were given to address and control the event without losing sight of other operational responsibilities.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
12/10/1998	1998024	Pri: OPS Sec:	NRC	NEG	Pri: 1C Sec: Ter:	Deficiency in requalification examination development process A deficiency in the requalification examination development process was identified in that the process does not address the verification of 10 CFR 55.43 sampling for the written requalification examination.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
12/10/1998	1998024	Pri: OPS Sec:	NRC	WK	Pri: 1A Sec: 1B Ter:	Generic operator weakness identified related to control board awareness A generic operator performance weakness was identified in the area of control board awareness, which involved repeated failures of operators to take appropriate responses to changing plant parameters or system misalignments. Also, inconsistent communications were observed during crew briefings given during the dynamic simulator scenarios.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
11/11/1998	1998022	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: Ter:	Timely and appropriate operator response to a partial loss of annunciators. The control room operators demonstrated proper safety focus in responding to a partial loss of annunciators on the reactor control board. The crew's evaluation of the significance of the event and their implementation of compensatory measures were both timely and appropriate. A methodical troubleshooting plan was effective in isolating the root cause and returning the annunciators to service
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
11/06/1998	1998301	Pri: OPS Sec:	NRC	STR	Pri: 1A Sec: 3B Ter:	Good operator communications during examinations Good operator performance and communication practices were observed during the initial operator licensing examination.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
11/06/1998	1998301	Pri: OPS Sec:	NRC	WK	Pri: 1C Sec: Ter:	Poor examination submittal The licensee initially failed to submit an acceptable examination for administration to operator license applicants for the operating test portion of the examinations. The final as-given examination met the requirements of NUREG-1021 and was considered good quality.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
11/05/1998	1998022-01	Pri: OPS Sec:	NRC	VIO IV	Pri: 1A Sec: Ter:	Failure to log and track the status of the standby liquid control system During performance of a quarterly Technical Specification surveillance on the standby liquid control system, neither the procedure nor control room logs adequately tracked the equipment configuration to verify adherence to short term outage times allowed by Technical Specifications. As a result, the status of system operability with both trains inoperable could not be accurately reconstructed. The failure to log and track the status of the standby liquid control system was identified as a violation of the equipment control process and Technical Specification 5.4.1.a; however, because of appropriate corrective actions, no response was required.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/12/1999	1999007	Pri: MAINT Sec:	NRC	POS	Pri: 2B Sec: 3A Ter:	Maintenance work conducted reliably with management oversight Maintenance work observed by the inspectors was conducted in a manner that ensured reliable, safe operation of the station. More effective and frequent management observation of maintenance activities was observed.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/27/1999	1999006	Pri: MAINT Sec:	NRC	POS	Pri: 3A Sec: Ter:	Satisfactory testing program for the control room emergency filtration system The licensee implemented a satisfactory testing program for the control room emergency filtration system. The testing interval and method met Technical Specification requirements.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/17/1999	1999007	Pri: MAINT Sec:	Licensee	NEG	Pri: 2B Sec: 3C Ter:	Interim repairs to turbine building roof not successful resulting electrical panel fire due to rain The licensee made comprehensive repairs to the turbine building roof to prevent further rainwater intrusion into the turbine building. However, interim protective measures, during installation, were not totally successful since a sudden rainstorm resulted in a small fire in a lighting panel.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
04/25/1999	1999004-03	Pri: MAINT Sec: PLTSUP	NRC	NCV	Pri: 2A Sec: 3A Ter:	Violations of Technical Specification 5.4.1: unsecured eyewash station and failure to post a CA Plant housekeeping and material condition were generally good; however, the inspectors found an unsecured portable eye wash station too close to the high pressure core spray batteries in violation of procedural requirements. This is one example of a Severity Level IV violation of Technical Specification 5.4.1.a, which is being treated as a noncited violation and is in the licensee's corrective action program as Problem Evaluation Request 299-0889 Radiological controls associated with the unloading of fresh fuel were generally good and health physics oversight helped personnel maintain exposure ALARA. However, the licensee failed to post or mark a contaminated area as required by procedure. This is one example of a Severity Level IV violation of Technical Specification 5.4.1.a and is being treated as a noncited violation. This deficiency is in the licensee's corrective action program as Problem Evaluation Request 299-0718
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission
PLANT ISSUE MATRIX
 By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
04/11/1999	1999004	Pri: MAINT Sec:	NRC	NEG	Pri: 2B Sec: Ter:	Procedural weakness for scaffold erection The inspectors identified a procedure weakness that allowed potential interferences between scaffolding and instrument sensing lines to be evaluated by the craft erecting the scaffolding. This was inconsistent with other guidance in the procedure which required engineering evaluation and a 10 CFR 50.59 review for potential interferences between scaffolding and important-to-safety components. At the close of the inspection, engineering was planning to revise the scaffolding procedure to ensure that potential interferences with instrument sensing lines will receive a similar degree of evaluation as other safety-related components
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/20/1999	1999002	Pri: MAINT Sec:	NRC	NEG	Pri: 2B Sec: 3A Ter:	Licensee Identification of poor work planning. During review of licensee-generated PERs, the inspector noted several instances of poor planning, coordination, and execution of maintenance activities. These resulted in: (1) safety-related equipment being inoperable longer than was necessary, (2) safety-related equipment being unnecessarily rendered inoperable, (3) SFP temperature exceeding expected values, and (4) the potential for fire protection system compensatory measures to be incorrectly sequenced.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/06/1999	1998025	Pri: MAINT Sec:	NRC	POS	Pri: 3A Sec: 3B Ter:	Maintenance personnel used good 3-way communications, peer checking during SDV maintenance Personnel performing a surveillance test at the scram discharge volume limit switches used good three-way communications, peer verification, procedure adherence and place-keeping, and ALARA (as low as reasonably achievable) practices.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
01/29/1999	1998025-01	Pri: MAINT Sec:	NRC	VIO IV	Pri: 3A Sec: 4B Ter:	Scaffolding Installed without a required evaluation and failure to properly adjust the scram valve limit switch The first example of a violation of Technical Specification 5.4.1.a was identified because the licensee failed to perform the required evaluations for scaffolding that was supported by a non-load bearing member of a Class 1 component. The second example of a violation of Technical Specification 5.4.1.a and plant procedures occurred because personnel failed to follow the written procedures for adjusting the outlet scram valve limit switch. Because the licensee implemented appropriate corrective actions, no response was required. Maintenance personnel performance during control rod drive hydraulic control unit refurbishment demonstrated knowledge deficiencies in the proper use of, adherence to, and change of procedures. In addition, mechanic's knowledge on the proper adjustment of limit switches was insufficient and postmaintenance testing did not identify that the outlet scram valve limit switch was improperly adjusted. Because the licensee implemented appropriate corrective actions, no response was required.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
10/07/1998	1998022-02	Pri: MAINT Sec:	NRC	VIO IV	Pri: 3A Sec: 2B Ter:	Failure of maintenance to perform SGT B testing in accordance with the written test procedure. Maintenance personnel performance during Technical Specification required testing of the standby gas treatment system demonstrated knowledge deficiencies in the proper use of and adherence to procedures. The failure in two instances to properly conduct the standby gas treatment system test was identified as a violation Technical Specification 5.4.1.a. Planning and briefing for the work failed to ensure that all prerequisites were met prior to the start of the test, and procedure steps were not performed in sequence. Since the licensee implemented appropriate corrective actions, no response was required
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
06/12/1999	1999007-02	Pri: ENG Sec:	Self	NCV	Pri: 4C Sec: Ter:	Violations of Criterion III related to overcurrent relay setpoints; new fuel vault TS; and lifting bail for new fuel A Severity Level IV violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," with three examples was identified. This Severity Level IV violation is being treated as a noncited violation, consistent with Appendix C of the NRC Enforcement Policy. (1) Incorrect overcurrent relay setpoints were installed on four Division II safety-related pump breakers when correct design information was available but not accurately translated into procedures (Problem Evaluation Request 299-1193). (2) Technical Specification 4.3.1.2.b allowed less restrictive spacing of new fuel assemblies in the new fuel vault than that required by plant procedures and analysis (Problem Evaluation Request 299-1238). (3) Final Safety Analysis Report Section 9.1.1.3.2 stated, "lifting bail will yield at a pull up force less than 1000 lb," however, Siemens and ASEA Brown Boveri fuel lifting bails yield at a pull up force between 1500 and 1700 pounds (Problem Evaluation Requests 299-1289).
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/12/1999	1999007-03	Pri: ENG Sec:	Licensee	URI	Pri: 1A Sec: 3A Ter:	Analysis for potential effects on ABB fuel assemblies during long-term operation with missing or broken spr An unresolved item was identified related to a new fuel manufacturing defect. The licensee identified missing external compression springs on two new fuel assemblies. This item is unresolved pending NRC review of the facilities resolution of this condition.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/01/1999	1999004-04	Pri: ENG Sec:	NRC	URI	Pri: 4A Sec: 5A Ter:	violation of 10 CFR 50.59; Technical Specification Table 3.3.1.1-1 note (d) no longer applicable. Technical Specification 3.3.6.1, "Primary Containment Isolation Instrumentation," Function 5, "Residual Heat Removal Shutdown Cooling System Isolation," and the associated bases section were incorrect. The Technical Specifications were not updated when the controls for the outboard isolation valve were removed from the alternate remote shutdown panel. In addition, the bases section incorrectly stated that there are four pressure switches associated with the reactor high pressure isolation instrumentation, when only two exist. This issue is identified as an unresolved item because additional information is required in order to confirm the facility was originally licensed with only two pressure switches and to review the 10 CFR 50.59 evaluation for the change
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/20/1999	1999002-02	Pri: ENG Sec:	NRC	NCV	Pri: 4B Sec: Ter:	Violations of Criterion III: Undersized pwr supply & insufficient penetration overcurrent protection In 1988, the licensee had installed an undersized power supply in the emergency diesel generator (EDG) speed interlock circuits. The inspectors concluded that the marginal design of the power supply did not pose a significant risk for common mode failure of the Divisions I and II EDGs. However, the failure to correctly size the power supply is one example of a noncited violation (NRC Enforcement Policy, Appendix C) of 10 CFR Part 50, Appendix B, Criterion III, "Design Control." In 1998, the licensee discovered that the primary containment penetration for Valve RHR-MO-9 did not meet the overcurrent protection requirements of Regulatory Guide 1.63, "Penetration Assemblies in Containment Structures for Light-Water-Cooled Nuclear Power Plants," Revision 0, as committed to in the WNP-2 Final Safety Analysis Report (FSAR). The failure to translate the design basis specified in the license application into the design of the facility is one example of a noncited violation (NRC Enforcement Policy, Appendix C) of 10 CFR Part 50, Appendix B, Criterion III, "Design Control."
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/01/1999	1998025	Pri: ENG Sec:	NRC	POS	Pri: 3B Sec: 4B Ter:	PMT review identified a need for a TS change. The evaluation of postmaintenance testing required for the repair of Circulating Water Pump C, including any impact on plant operations and Technical Specification requirements, identified the need for a Technical Specification change. The licensee completed the repair and testing of Circulating Water Pump C without incident.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
12/07/1998	1998023-01	Pri: ENG Sec:	NRC	VIO IV	Pri: 4A Sec: Ter:	LPCS out-of-service annunciator not in conformance with Final Safety Analysis Report. The configuration of the low pressure core spray (LPCS) out-of-service signals from Battery B1-1, Diesel Generator 1, and Service Water A were not supplied to the annunciator. This design deficiency was not identified during ongoing efforts to review the accuracy of the FSAR. The failure to ensure that the design basis, as specified in the license application, was correctly translated into drawings was identified as a violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control." However, because the licensee implemented appropriate corrective actions, no response was required.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
10/10/1998	1998021	Pri: ENG Sec:	NRC	NEG	Pri: 4C Sec: Ter:	The manual startup & shutdown of RCIC, following the March 1998 MSIV closure, challenged operators The manual startup and shutdown of the reactor core isolation cooling system for level control, following the March 1998 main steam isolation valve closure, challenged the operators. The proceduralized method to control reactor vessel level by diverting reactor core isolation cooling flow through the test return line could not be accomplished because of valve design deficiencies. The method used to maintain the reactor core isolation cooling system test return line isolation valves decreased the reliability of the system and challenged the containment isolation function since the valves may not have closed against high differential pressure. Unresolved Item 50-397/98005-05, involving exclusion of the reactor core isolation cooling test return line valves from the scope of the maintenance rule, was determined not to be a violation of NRC requirements (EA 98-203)
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
10/07/1998	1998022-03	Pri: ENG Sec: MAINT	NRC	VIO IV	Pri: 4C Sec: 2B Ter:	Inadequate procedural guidance for performance of SGT charcoal filter bypass leakage testing The procedure for conducting bypass leakage testing of the standby gas treatment system charcoal filters was inadequate in that the procedure failed to provide sufficient instructions for injection of the challenge gas to ensure proper mixing in the filter plenum. A violation of Technical Specification 5.4.1.e was identified for the inadequate procedure. As a result, dispersion of the challenge gas has not always been sufficient to challenge all portions of the charcoal filters in order to verify Technical Specification bypass leakage requirements. The inadequate procedure did not result in a safety issue, as subsequent testing with proper challenge gas dispersion demonstrated compliance with Technical Specifications. Since the licensee implemented appropriate corrective actions, no response was required
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
06/12/1999	1999007	Pri: PLTSUP Sec:	Licensee	POS	Pri: 1A Sec: 5A Ter:	Good radiological controls. The inspectors observed that radiological controls were generally good and that the facility appropriately identified an adverse trend in contractor radiation work practices.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
05/27/1999	1999006	Pri: PLTSUP Sec:	NRC	STR	Pri: 3A Sec: Ter:	Good radioactive effluent management program The licensee maintained a good radioactive effluent management program. Radioactivity in effluent releases was low. The licensee's radioactive effluent sampling, analysis, and dose projection program met the requirements of the Offsite Dose Calculation Manual. Effluent radiation monitors were calibrated at intervals typically used by nuclear power facilities. Quality assurance personnel conducted a good audit of the radioactive effluent monitoring program in 1998. The audit team included a technical specialist who provided performance-based findings and recommendations. The audit scope, while not completely comprehensive, provided licensee management with good insights into the program performance.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
05/27/1999	1999006-01	Pri: PLTSUP Sec:	NRC	NCV	Pri: 3A Sec: 3C Ter:	Effluent radiation monitor alarm setpoint calculation error. The radwaste and turbine building effluent radiation monitor alarm setpoints were not calculated with Offsite Dose Calculation Manual methodology in violation of Technical Specification 5.5.1. This Severity Level IV violation is being treated as a noncited violation, consistent with Appendix C of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Problem Evaluation Request 299-1207. The licensee had an opportunity to identify and correct the alarm setpoint problem in September 1995, but the corrective action program was weak and did not ensure that the problem was addressed completely.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/20/1999	1999002-03	Pri: PLTSUP Sec:	NRC	NCV	Pri: 3A Sec: 4B Ter:	Failure to ensure flame spread rate criterion was met for decontaminable floor coverings. A noncited violation (NRC Enforcement Policy, Appendix C) of a License Condition was identified in that the licensee failed to implement and maintain in effect all provisions of the approved fire protection program as described in the FSAR. Specifically, the licensee failed to ensure that decontaminable coatings used on floors in the reactor building had a flame spread rate less than 25. This violation is in the licensee's corrective action program as PER 299-0278.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/18/1999	1999003	Pri: PLTSUP Sec:	Licensee	NEG	Pri: 2B Sec: Ter:	Poor pre-job planning for refurbishing CRD hydraulic control units Poor pre-job planning and preparation for control rod hydraulic control unit refurbishment caused a significant underestimation of projected man-hours and personnel exposure. Specific licensee-identified deficiencies included not using a dedicated team as originally planned, ineffective mock-up training, no formal ALARA review of the job performed, inadequate procedural guidance, and ineffective use of industry experience.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/18/1999	1999003	Pri: PLTSUP Sec:	NRC	POS	Pri: 1C Sec: Ter:	Overall RP activities conducted well. Overall, radiation protection activities were conducted well and demonstrated an improving trend. Decontamination of contaminated areas was effective in that the total number of contaminated areas was reduced from 77 to 56 since October 1998. Radiological areas were controlled and posted as required. Radiation work permits and radiological surveys were clearly written and provided accurate radiological conditions and established proper radiological controls. Portable radiation survey instrumentation and personnel contamination monitors were calibrated and response checked at the frequencies required by station procedures using National Institute of Standards and Technology traceable sources.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/18/1999	1999003	Pri: PLTSUP Sec:	NRC	POS	Pri: 1C Sec: Ter:	Licensee efforts resulted in ALARA dose reduction The Senior Site ALARA Committee was actively involved in reducing station dose by implementing short- and long-term initiatives. The station 3-year average exposures have shown a declining trend since 1996; the 3-year average dose dropped from 565 person-rem in 1996 to 303 person rem in 1998. The station established challenging dose goals of 203 and 53 person-rem for 1999 and 2000, respectively.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/18/1999	1999003	Pri: PLTSUP Sec:	NRC	POS	Pri: 2A Sec: Ter:	Good housekeeping in contaminated areas Housekeeping in the radiological controlled area was good. Equipment was stored in an orderly manner, areas were free of debris, and potentially contaminated trash was properly stored in labeled containers.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

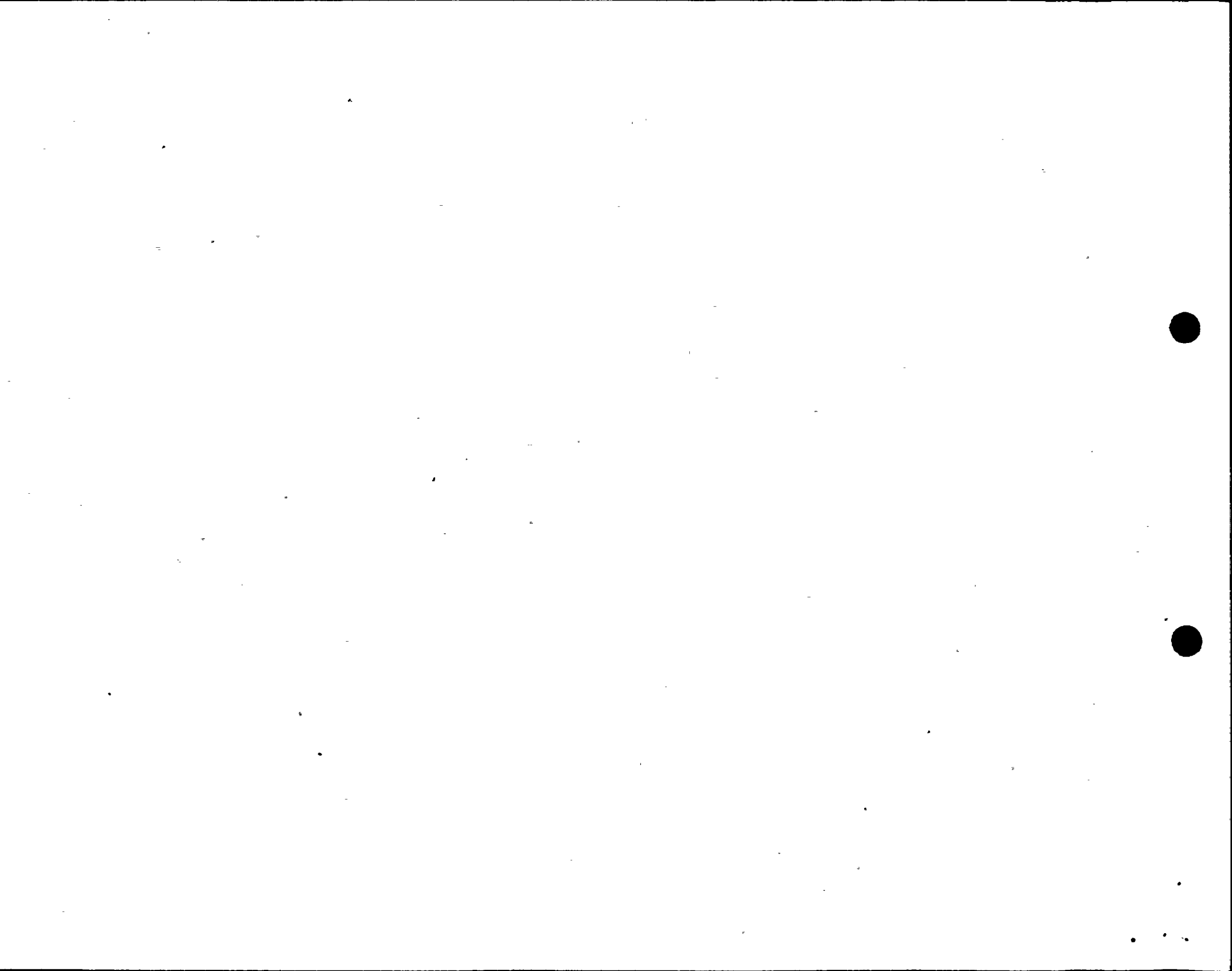
United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
03/18/1999	1999003	Pri: PLTSUP Sec:	NRC	POS	Pri: 5A Sec: Ter:	Thorough QA audits of RP program. The licensee performed a thorough evaluation of the radiation protection program in the past 8 months as indicated by five quality assurance surveillances, two quality assurance technical assessments, and six radiation protection department self assessments. These evaluations were probing and comprehensive, and provided management with accurate information on radiation protection program effectiveness.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
03/05/1999	1999001	Pri: PLTSUP Sec:	NRC	POS	Pri: 3A Sec: Ter:	Security staffing and response to OSRE satisfactory On-shift staffing of security armed response personnel was in accordance with the minimum requirements of the physical security plan. During the OSRE, the licensee successfully demonstrated its ability to defend against the design basis threat.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/06/1999	1998025	Pri: PLTSUP Sec:	NRC	NEG	Pri: 2A Sec: Ter:	Plant material condition mixed Material condition of and housekeeping in areas toured was generally good. However, water was identified leaking from a flange below a control rod drive filter housing. A contaminated area was not completely marked. Specifically, yellow and magenta tape was not used on a small section of floor to designate a contaminated area.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/04/1999	1999001	Pri: PLTSUP Sec:	NRC	POS	Pri: 1C Sec: Ter:	Highly effective security program implementation. Security program implementation continued to be highly effective in most areas. An effective program for searching personnel, packages, and vehicles was maintained. The compensatory measures program was effectively implemented. A highly effective lock and key control program was maintained and implemented. Changes to security programs and plans were reported to the NRC within the required time frame. Overall, implementing procedures met the performance requirements in the physical security plan. The security staff correctly reported security events; event records were accurate and neat. An excellent training program was implemented. Security program management was effective.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
02/04/1999	1999001	Pri: PLTSUP Sec:	NRC	STR	Pri: 1C Sec: Ter:	Excellent, intrusive fitness for duty audit The annual audit of the Fitness-for-Duty Program was excellent. The audit was intrusive and performance based.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
12/15/1998	1998023-02	Pri: PLTSUP Sec:	NRC	IFI	Pri: 4C Sec: 2B Ter:	Kaowool fire seal not installed per design. The licensee did not effectively ensure that the fire seal for Containment Penetration X099 was in accordance with licensee drawings and not degraded, as evidenced by the loosely packed penetration seal that issued a warm gas. Based on gas analysis, the licensee confirmed that gas was not from containment. In addition, the initial slow response to the inspectors' concern of a warm gas issuing from a penetration was not commensurate with the potential safety significance of the finding.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						



United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Region IV
 WASH. NUCLEAR PROJECT

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
12/14/1998	1998023-03	Pri: PLTSUP Sec:	NRC	VIO IV	Pri: 3A Sec: Ter:	Security officer reading unauthorized material at SAS The inspectors found a security officer reading a magazine, unauthorized material, while on duty in the secondary alarm station (SAS). This was a violation of License Condition 2.E for failure to meet the Commission-approved physical security plan; however, since the licensee implemented appropriate corrective actions, no response was required.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
12/08/1998	1998023	Pri: PLTSUP Sec:	NRC	NEG	Pri: 5C Sec: Ter:	Generally weak corrective actions for a contamination zone The immediate corrective actions associated with water leaking from an established contamination zone were adequate. However, the corrective actions resulting from previous incidents were weak, as evidenced by water leaking from the contamination zone.
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						
10/13/1998	1998022-04	Pri: PLTSUP Sec:	Licensee	NCV	Pri: 2A Sec: 2B Ter: 5A	Failure to maintain PASS at the appropriate priority to ensure operability commensurate with safety. The failure to assign the appropriate priority for performing maintenance on post accident sampling system limit switches was identified as a noncited violation of Technical Specification 5.4.1.a and maintenance procedures, consistent with Section VII.B.1 of the Enforcement Policy. Reliability and availability of the post accident sampling system had been adversely impacted by both repetitive limit switch failures and untimely maintenance. The low priority placed upon maintenance of the limit switches left the system in a degraded condition for 10 months and inoperable for approximately 2 months, until the failure of a quarterly operability surveillance elevated the issue. Subsequent actions were more timely and comprehensive to address the reliability concerns
Dockets Discussed: 05000397 WASHINGTON NUCLEAR 2						

United States Nuclear Regulatory Commission

PLANT ISSUE MATRIX

By Primary Functional Area

Legend

Type Codes:

BU	Bulletin
CDR	Construction
DEV	Deviation
EEI	Escalated Enforcement Item
IFI	Inspector follow-up item
LER	Licensee Event Report
LIC	Licensing Issue
MISC	Miscellaneous
MV	Minor Violation
NCV	NonCited Violation
NEG	Negative
NOED	Notice of Enforcement Discretion
NON	Notice of Non-Conformance
OTHR	Other
P21	Part 21
POS	Positive
SGI	Safeguard Event Report
STR	Strength
URI	Unresolved item
VIO	Violation
WK	Weakness

Template Codes:

1A	Normal Operations
1B	Operations During Transients
1C	Programs and Processes
2A	Equipment Condition
2B	Programs and Processes
3A	Work Performance
3B	KSA
3C	Work Environment
4A	Design
4B	Engineering Support
4C	Programs and Processes
5A	Identification
5B	Analysis
5C	Resolution

ID Codes:

NRC	NRC
Self	Self-Revealed
Licensee	Licensee

Functional Areas:

OPS	Operations
MAINT	Maintenance
ENG	Engineering
PLTSUP	Plant Support
OTHER	Other

EEIs are apparent violations of NRC Requirements that are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action" (Enforcement Policy), NUREG-1600. However, the NRC has not reached its final enforcement decision on the issues identified by the EEIs and the PIM entries may be modified when the final decisions are made.

URIs are unresolved items about which more information is required to determine whether the issue in question is an acceptable item, a deviation, a nonconformance, or a violation. A URI may also be a potential violation that is not likely to be considered for escalated enforcement action. However, the NRC has not reached its final conclusions on the issues, and the PIM entries may be modified when the final conclusions are made.

ENCLOSURE 2
 WASH. NUCLEAR PROJECT
 Inspection / Activity Plan
 09/01/1999 - 03/31/2000

Units	Inspection Activity	Title	Number of NRC Inspectors / Individuals	Planned Dates Start End	Inspection Type
2	IP 73753	Inservice Inspection	1	09/27/1999 10/01/1999	Core
2	IP 81700	Physical Security Program For Power Reactors	1	10/25/1999 10/29/1999	Core
2	IP 40500	Effectiveness Of Licensee Process to Identify, Resolve, And Prevent Problems	2	01/10/2000 01/14/2000	Core
2	IP 84750	Radioactive Waste Treatment, And Effluent And Environmental Monitoring	1	01/10/2000 01/14/2000	Core
2	IP 86750	Solid Radioactive Waste Management And Transportation Of Radioactive Mate	1	01/10/2000 01/14/2000	Core
2	IP 40500	Effectiveness Of Licensee Process to Identify, Resolve, And Prevent Problems	2	01/24/2000 01/28/2000	Core
2	IP 83750	Occupational Radiation Exposure	1	02/07/2000 02/11/2000	Core
2	IP 82701	Operational Status Of The Emergency Preparedness Program	1	02/28/2000 03/03/2000	Core
2	IP 37001	10 CFR 50.59 Safety Evaluation Program	1	02/28/2000 03/17/2000	Core
2	IP 93809	Safety System Engineering Inspection (SSEI)	5	02/28/2000 03/17/2000	Core

This report does not include INPO and OUTAGE activities.
 This report shows only on-site and announced inspection procedures.