

POOR ORIGINAL

Washington Public Power Supply System
A JOINT OPERATING AGENCY



P. O. Box 988 2000 6th WASHINGTON WAY RICHLAND, WASHINGTON 99352 PHONE (509) 375-5000

Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1990 N. California Boulevard
Walnut Creek, California 94596

December 12, 1980
60-1-80-381

Attention: Mr. G. S. Spencer
Chief Reactor Construction
and Engineering Support Branch

Gentlemen:

Subject: WPPSS NUCLEAR PROJECTS NOS. 1/4
NRC INSPECTION - WNP-1/4
DATES OF INSPECTION - October 20-23, 1980
DOCKET NOS. 50-460 AND 50-513
CONSTRUCTION PERMIT NOS. CPPR-134 AND -174

Reference: Letter from G. S. Spencer to R. L. Ferguson, NRC Inspection
at WNP-1/4 Site, dated November 21, 1980.

The referenced correspondence delineated the results of the October 20-23, 1980 inspection of activities authorized by NRC Construction Permits Nos. CPPR-134 and -174. Further, the referenced correspondence identified certain activities which were not conducted in full compliance with PSAR requirements set forth in the Notice of Violation enclosed as Appendix A. This item of noncompliance has been categorized into a level as described in Supplement II of the Federal Register dated October 7, 1980 (45 FR 66754) as the interim Enforcement Policy.

This letter is submitted in response to the referenced correspondence. The specific NRC finding, as identified, and the Supply System response is provided herewith as Appendix A.

Very truly yours,

D. W. Mazur
WNP-1/4 Program Director

pm
Enclosure (1)

cc: JR Lewis - BPA
CR Bryant - BPA
V. Mani - UE&C, Phil.
V. Stello - Director of Inspection and Enforcement - NRC

8101300 **588**

80-70

APPENDIX A

Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1990 N. California Boulevard
Walnut Creek, California 94596

POOR ORIGINAL

Docket No. 50-460
Construction Permit No. CPPR 134

NOTICE OF VIOLATION

As a result of the inspection conducted on October 20-23, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10CFR50, Appendix B, Criterion IV, as implemented by Section 17.1.4 of the quality assurance program documented in the PSAR states, in part, that "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services, whether purchased by the applicant or by its contractors or subcontractors..."

Contrary to the above, as of October 23, 1980, the measures established by the site mechanical contractor and their painting subcontractor were not adequate to assure that procurement documents included those requirements necessary to assure adequate quality of the paint to be used on equipment within the containment. Contract specification No. 9779-211 requires the paint to have a decontamination factor of ten. The paint ordered, received and placed in storage for use had a decontamination factor of 6.3.

This is a severity level IV violation (Supplement II of Federal Register Notice 45 FR 66754, dated October 7, 1980).

SUPPLY SYSTEM RESPONSE

Corrective Action Taken and the Results Achieved

The approval by the Architect Engineer contained in Corrective Waiver Request Numbers 211-039 and 257-048 permits the specified paint to have a decontamination factor of less than ten (10). Mobil Zinc 7 with a decontamination factor of 6.3 meets the requirements of ANSI N5.12 which specifies a typical range for decontamination factor of five to twenty (5 to 20). For clarification it should be noted that the test results for Mobil Zinc 7 (13F12) indicated an overall decontamination factor of 6.2 and not 6.3 as referenced in the Notice of Violation.

Contract

POOR ORIGINAL

A system breakdown by the mechanical contractor and subcontractor respectively occurred as a result of a failure to specify the specific type and formula for Mobil Zinc 7 in the procurement documents and subsequent review of that document which resulted in the procurement, and actual receipt of the wrong formula Mobil Zinc 7 paint.

The mechanical contractor has documented this discrepancy in Nonconformance Report Number CNCR 211-232. Project Quality Assurance initiated Corrective Action Request Number 211-03 to the mechanical contractor for failure to adequately control sub-tier procurement.

Contract Waiver Request Numbers 211-039 and 257-045 have been reviewed by the Architect Engineers' Materials and Coatings Specialist and substantiated the prior approval of the aforementioned Contract Waiver Request.

Corrective Action to Preclude Recurrence

- 1). Project Quality Assurance personnel have been instructed to route all Contract Waiver Requests dealing with material substitutions through the Quality Assurance Engineering Group or the Architect Engineer for approval. The Quality Assurance Engineering Group will provide the necessary interface with the Materials and Coatings Specialist to ensure proper review.
- 2). The mechanical contractor will review all existing and future sub-tier procurement actions in accordance with actions required by Contract Waiver Request Numbers 211-039 and 257-045 to ensure proper inclusion of all applicable specification requirements.
- 3). Greater emphasis will be placed on contractor and subcontractor procurement documents during the audit process to ensure that applicable regulatory requirements, design criteria and other requirements which are necessary to assure adequate quality are suitably included or issued in the documents for procurement of material, equipment, and supplies.

Date of Full Compliance

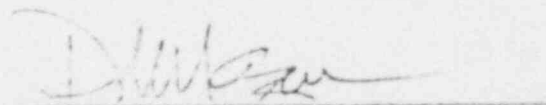
Nonconformance Report Number CNCR 211-232, issued by the mechanical contractor establishes the control of the nonconforming paint as of this date.

POOR ORIGINAL

STATE OF WASHINGTON)
COUNTY OF BENTON) ss

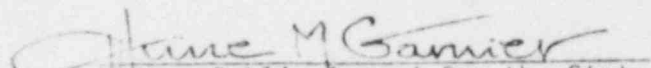
D. W. MAZUR, Being first duly sworn, deposes and says: That he is the Program Director, WNP-1/4, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED 12/12, 1980


D. W. MAZUR

On this day personally appeared before me D. W. MAZUR to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 12th day of December, 1980


Notary Public in and for the State
of Washington
Residing at Benton County