

Washington Public Power Supply System
A JOINT OPERATING AGENCY

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January 9, 1981
G03-81-059

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

Attention: Mr. R. H. Engelken

Gentlemen:

Subject: WPPSS NUCLEAR PROJECTS 3 AND 5
NRC INVESTIGATION OF ALLEGATIONS

References: 1) Letter, R. H. Engelken to F. D. McElwee,
same subject, dated December 15, 1980.
2) Federal Register Notice (45 FR 66754),
dated October 7, 1980.

This letter is in response to your letter of December 15, 1980 which discussed the results of the investigation conducted September 25 to October 30, 1980 of activities authorized by Nuclear Regulatory Commission Construction Permit CPPR-154 and CPPR-155. The letter identified one (1) item of noncompliance categorized in accordance with Reference 2 and required the Supply System to provide a response to this item.

The specific Nuclear Regulatory Commission finding, as stated in your letter, and the Supply System response are provided in Attachment 1 to this letter.

Your letter also requested that we address how lessons learned at WNP-2 have been applied to WNP-3/5.

The Supply System has historically, and continues to, transfuse information/knowledge/experience among all its projects utilizing various management methods, e.g.:

- personnel transfers (both interproject and interdepartment)
- correspondence exchange
- standardization of methods



Many examples exist which demonstrate the positive results realized from these efforts. A number of such examples have been tabulated in previous Supply System correspondence to the NRC (e.g., 50.54(f) July 17 response, Attachment 6). Additional examples specifically beneficial to WNP-3/5 as a result of WNP-2 experiences include such diverse improvements as the following:

- Design and fabrication requirements imposed on contractors supplying heavy fabrications have focused on minimization of lamellar tearing.
- Training programs have been instituted at WNP-3/5 to provide additional assurance that personnel are competent in their applicable areas of responsibility.

Recognizing that this informal management system has not been fully effective in achieving the desired results, the Supply System in its response to the NRC's 50.54(f) letter included a "lessons learned" program among corrective measures proposed for problems identified at WNP-2. This program provides for the compilation of knowledge gained from contractor/Task Force II reviews of past work at WNP-2 and the dissemination of this information to management at all Supply System sites.

In anticipation and support of this effort, WNP-3/5 is developing a corollary management system which will evaluate identified generic problem areas for WNP-3/5 applicability and provide for development, implementation and followup of action plans as required.

Status information concerning the formal program for compilation and dissemination of lessons learned at WNP-2 is currently provided to the NRC via bi-monthly written reports relative to the WNP-2 50.54(f) matter. It is anticipated that the WNP-3/5 system which will cause evaluation/action as a result of those lessons learned will be fully developed and ready for implementation by March 2, 1981.

Very truly yours,



D. E. DOBSON
Acting Program Director - WNP-3/5

Attachment

cc: D. Smithpeter - BPA
Ebasco - New York
WNP-3/5 Files - Richland

ATTACHMENT I

A. NUCLEAR REGULATORY COMMISSION FINDING

10 CFR 50, Appendix B, Criterion XII states, in part, "Measures shall be established to assure that tools, gauges, instruments, and other measuring and testing devices are...properly...calibrated...at specified periods..."

Paragraph 17.4.12.1.a of the Washington Public Power Supply System Quality Assurance Program documented in the PSAR states, in part, that, "...site contractors' approved procedures establish a system for the control, calibration and adjustment of tools, gauges, instruments and other inspection, measuring, testing and maintenance devices used at the site. This system is established such that conformance to established requirements is verified at specific periods of time to assure the usage of proper type, range and accuracy of the device."

Procedure No. QCP-8-10, revision 2, of the site HVAC contractor, Wallace/Superior, states, in part, "All calibration records shall be reviewed at the beginning of each month by the Project Quality Assurance Manager/Designee..."

Contrary to the above, on September 25, 1980, the Wallace/Superior calibration records had not been reviewed by the Project Quality Assurance Manager or designee since July 1, 1980. Furthermore, the calibration records for five pieces of equipment documented that the equipment had not been recalled and recalibrated within the dates specified on the calibration record as follows:

<u>Equipment</u>	<u>Serial No.</u>	<u>Date last calibrated</u>	<u>Recall Date</u>
Portable rod oven	W/S 001	2/25/80	8/25/80
Portable rod oven	W/S 004	3/10/80	9/10/80
Portable rod oven	W/S 008	3/13/80	9/13/80
Portable rod oven	W/S 009	3/13/80	9/13/80
Welding Machine	W/S 006	3/10/80	9/10/80

This is a Severity Level VI violation (Supplement II).

B. RESPONSE TO NRC FINDING

Corrective Steps Which Have Been Taken And The Results Achieved:

Wallace/Superior has completed a review of all calibration records per the requirements of QCP-8-10. This review indicated only the items noted in the violation had exceeded their calibration interval.

The portable rod ovens were checked on 10-15-80 to verify operation with the allowable temperature range. All ovens were within the required range.

NCR 2858 has been prepared to document the exceeding of calibration intervals.

ATTACHMENT I (CONT.)

Corrective Steps Which Will Be Taken To Avoid Further Violation:

Wallace/Superior personnel have been trained in the implementation of QCP-8-10.

Welding machines do not require calibration by 3240-232 contract requirements, and as such have been removed from the calibration program. QCP 7-7 will be revised to indicate portable rod holding ovens will be periodically checked to verify operating temperatures are within the allowable range.

Date Of Full Compliance:

All actions were complete as described above on January 7, 1980.

D. E. DOBSON, Being first duly sworn, deposes and says: That he is the Acting Program Director, WNP-3/5, 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 1.9., 1981.

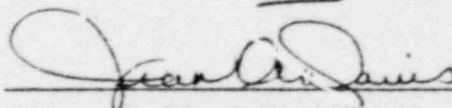


D. E. DOBSON

STATE OF WASHINGTON)
) ss
COUNTY OF GRAYS HARBOR)

On this day personally appeared before me D. E. DOBSON 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 9th day of JANUARY, 1981.



Notary Public in and for the State
of Washington
Residing at Elma, WA