

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-508/82-07 (RS)

Docket No. 50-508 License No. CPPR-154 Safeguards Group

Licensee: Washington Public Power Supply System (WPPSS)

P. O. Box 968

Richland, Washington 99352

Facility Name: Washington Nuclear Project 3

Inspection at: WNP-3 Site, Satsop, Washington

Inspection conducted: March 23-25, 1982

Inspectors: E. M. Garcia
E. M. Garcia, Radiation Specialist

April 20, 1982
Date Signed

Date Signed

Date Signed

Approved by: F. A. Wenslawski
F. A. Wenslawski, Chief, Reactor Radiation
Protection Section

4/20/82
Date Signed

H. E. Book
H. E. Book, Chief, Radiological Safety Branch

4/20/82
Date Signed

Summary:

Inspection on March 23-25, 1982 (Report No. 50-508/82-07)

Areas Inspected: Routine unannounced inspection by a regional based inspector of the construction phase environmental protection program including organization and administration, procedures, audits, construction permit requirements, tour of site's surroundings, and processing of IE Circulars. The inspection involved 23 inspector-hours by a NRC Inspector.

Results: No items of noncompliance were identified.

RV Form 219 (2)

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DETAILS

1. Persons Contacted

a. Washington Public Power Supply System (WPPSS)

- *R. S. Leddick, Program Director WNP-3
- *J. E. Werle, Project Engineering Manager
- *O. E. Trapp, Project QA Manager
- K. Wise, Environmental Licensing Manager
- D. Coleman, Safety Engineering Manager
- *D. J. Lagrou, Plant Systems Engineering Supervisor
- *D. A. Kerlee, QA Audit Supervisor
- *A. R. Christian, Lead Environmental Engineer
- *E. L. Stephens, QA Engineer
- *L. T. Harrold, Engineering - Richland
- C. D. Strassburger, Administrative Analyst

b. Bonneville Power Administration

- *R. C. Hughes, Chief Inspector - Line Construction
- *S. F. Swearngin, Program Analyst

*Denotes those attending the exit interview.

2. Organization and Administration

The environmental protection organization has been deemphasized since the last environmental inspection (50-508/81-05). Specifically the following changes have taken place:

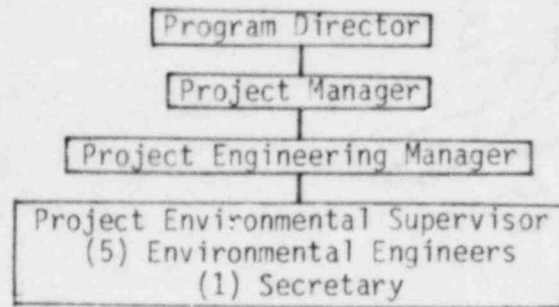
- a. Under the current organization one more level of management has been added between that staff solely dedicated to environmental protection and the most senior site management (see figure 1).
- b. The position of project Environmental Supervisor has been deleted. Today the senior environmental staff position is Lead Environmental Engineer.
- c. The environmental staff has been reduced from seven to four individuals. The inspector learned that one more individual was leaving as of March 26, 1982, and that the vacancy generated was unlikely to be filled due to the current freeze on hiring.

During the exit interview the inspector discussed the importance of maintaining an adequate environmental staff to monitor and insure compliance with the conditions of the construction permit. The Program Director stated that he would take this matter into consideration.

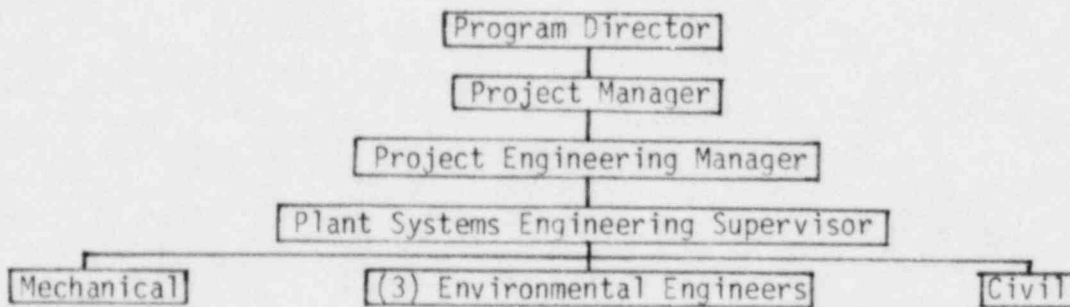
No items of noncompliance were identified.

Figure 1
ENVIRONMENTAL PROGRAM LINES OF RESPONSIBILITY
AT WNP-3

March 1981



March 1982



3. Procedures

The supply system has had a set of system wide policies and procedures that have existed in a number of different manuals. Among these manuals are the Technical Engineering Procedures (TEPs) and the Engineering Division Procedures and Instructions (EDPs & EDIs). Currently these procedures are being incorporated into a single manual called Corporate Policy and Procedures (CPPs). The week the inspector was at the site a new manual was announced entitled the Functional Manual of Nuclear Operations. The Functional Manual of Nuclear Operations will replace those CPPs that are related to Nuclear Operations.

The procedures and instructions that are specific to the WNP-3 site must concur with the documents listed above. Site construction activities are controlled by Project Site Procedures (PSPs). These procedures may apply to the supply system or its contractors. The environmental group's instructions are part of the Project Engineering Instructions (PEIs).

The inspector reviewed a number of these procedures and instructions including:

- | | | |
|-------------|---|--|
| TEP 11-2 | - | Environmental Commitment Control During Construction February 28, 1979, Revision 0 |
| PSP EM-3-1 | - | Environmental Protection Control Plan, June 2, 1981, Revision 1 |
| PSP EM-3-3 | - | Operation and Maintenance of the Chemical Treatment Facility April 15, 1981, Revision 0 |
| PSP EM-3-11 | - | Water/Wastewater Laboratory Analysis April 15, 1981, Revision 0 |
| PEI-GA-1 | - | Preparation, Review, Approval and Control of Project Engineering Department Instructions October 9, 1981, Revision 2 |
| PEI-GA-2 | - | Indoctrination and Training October 9, 1981, Revision 0 |
| PEI-ENV-1 | - | Fuel/Oil and Hazardous Material Inventory November 20, 1981, Revision 1 |

The inspector found that the applicant has adequate written procedures and instructions to control construction activities.

No items of noncompliance were identified.

4. Audits

TEP 11-2, Environmental Commitment Control During Construction, requires conduct of a semiannual audit of the environmental program. The inspector reviewed two audits. The first was an audit of the WNP-3 program conducted on July 13, 1981 by the Corporate Environmental Programs Department. The second, Corporate Quality Assurance Audit No. 82-208, was an audit of the Corporate Environmental Programs Department by Corporate QA.

The audit of July 13, 1981 has an unusual format. The audit does not have a clear statement of whether or not any items of noncompliance or Quality Findings Reports (QFR) were identified. Nor was there a requirement to respond by a specified date with a plan for corrective action. The inspector was also informed that the current environmental program management had not seen the report. The program supervisor stated that a report which requires no specific action is reviewed but has lower priority than those requiring action.

The manager of Environmental Licensing informed the inspector that the requirement for a semiannual audit of the WNP-3 site would be fulfilled for this half year by the audit of the Corporate Environmental Program that the corporate QA conducted.

The inspector discussed his concerns regarding audits during the exit interview. He stated that one of the purposes of an audit is for management to be able to identify deficiencies in their program in order to take appropriate corrective actions. Also, it is NRC enforcement policy to generally give credit for an applicant's timely identified and corrected problems. It is not clear with the format of the audit of July 13, 1981, how the management of the WNP-3 site would have learned of significant problems identified or taken timely corrective action. It is also not clear how an audit with emphasis on an organization outside the site can fulfill the specific needs of WNP-3. During the exit interview the Program Director stated that the inspector's comments would be considered.

No items of noncompliance were identified in this area.

5. Construction Permit Requirements

Construction Permit No. CPPR-154 states in section 3.E specific conditions for the protection of the environment. The inspector observed compliance with these conditions. Several specific observations are noted below.

a. Condition 3.E.1 states:

"The applicants shall establish a control program which shall include written procedures and instructions to control all construction activities and shall provide for periodic management audits to determine the adequacy of implementation of environmental conditions contained in this permit. The applicants shall maintain sufficient records to furnish evidence of compliance with all environmental conditions herein;"

The applicant's control program is described in sections 2, 3 and 4 of this report and in a previous inspection report (Report No. 50-508/81-05).

b. Condition 3.E.4 states:

"Construction plans and specifications will contain specific erosion and sediment control measures governing the excavation of borrow pits, the disposal of surplus excavation, and the construction of earth fills. State-of-the-art construction methods as discussed by the U.S. Environmental Protection Agency in the following two (2) publications will be adhered to:

'Processes, Procedures, and Methods to Control Pollution Resulting from all Construction Activity', EPA-430/9-73-007, October 1973, and

'Comparative Costs of Erosion and Sediment Control, Construction Activities,' EPA-430/9-73-018, July, "

The inspector observed that the approaches to erosion control discussed in Inspection Report 50-508/81-05 were still being used. The inspector also noted that the applicant had copies of the EPA documents listed in the condition.

c. Condition 3.E.5 states:

"Grading, groundcover, and seeding will be completed in each area of the site, providing its permanent configuration, as early as possible. Topsoil, having been stockpiled, will be returned to all disturbed areas and seeded. Topsoil compatible with ornamental planting and with native conifer species will be obtained from local sources if site stockpiles become depleted or are found to be low in quality. Temporary plantings for erosion protection will continue throughout the construction period as required. In areas where cutting and filling produce surplus excavation, earth sculpture techniques will be employed to return the site to complementary gradients and naturalistic land forms. Landscape plantings will be introduced in order to blend facilities into the landscape and complete the restoration process. Cleared areas will be stabilized in order to prevent long-term erosion.

Recommendations from the Soil Conservation Service will be considered in reseeding areas in natural vegetation. Shrubs and ground covers, particularly fruit and browse varieties, will be preserved wherever practicable."

The deficiency log maintained by the environmental group listed several instances where the erosion control measures had not been taken within 72 hours of the land being disturbed. The problem appears to be related to not being able to use the earth moving equipment when the ground is saturated with water after rains, and a matter of conflicts with the scheduling of resources at other times. The inspector was provided with a copy of a memo dated March 22, 1982 from corporate Environmental Licensing and Compliance to the Project Manager requesting management's attention to this issue in their planning.

d. Condition 3.E.9 states:

Vegetation will be left along the stream banks to minimize siltation and prevent temperature rises in the stream. During clearing operations, every effort will be made to prevent debris from falling into and clogging any stream channels. Care will be taken during construction to ensure that the natural landscape along the Chehalis River is not damaged. Measures will be instituted to insure that there will be no serious erosion, or permanent damage to the riverbed, or the biota in the river. Construction activities will be scheduled and provisions made so that there will be minimal interference with fish migration in the Chehalis River and Satsop River or their tributaries.

The Chehalis river is changing its course in the vicinity of the east most Ranney well. The river has started to cut behind the bank reinforcements that the applicant built. This impact appears to be a natural event, common with meandering rivers. Part of the applicant's bank reinforcement has now become a ripple in the river channel. The applicant is reviewing the effect of submersion of the power and control cables leading to the pump structure of the Ranney collector.

e. Condition 3.E.14 states:

Clearing of transmission line rights-of-way will include all measures described in (4) above. In addition, cleanup of all debris will be required. No herbicides or pesticides will be used during clearing operation.

The inspector expressed concern over the fact that the applicant's environmental control program did not extend into the transmission lines right of way work that is being conducted by the Bonneville Power Authority (BPA). The applicant's staff stated that the

condition of the permit only referred to the lines between the electrical generator and the BPA Satsop substation. The inspector left the matter as an open item until he had an opportunity to review those sections of the Environmental Report and Environmental Statement and consult with the Office of Nuclear Reactor Regulation. The applicant's position is correct and it is clear from the discussion in the above named documents that the conditions only relate to transmission lines between the electrical generator and the BPA Satsop substation. This item is closed.

No items of noncompliance were identified.

6. Tour

A tour of the site's surroundings was conducted on March 24, 1982. The tour included the Cooley Laydown area, the NSSS Haul road, the Ranney wells area and the Barge Unloading Facility.

The inspector observed conditions which indicate compliance with the requirements stipulated in the Construction Permit. Some specific observations have already been stated in Paragraph 5.c, and 5.d.

No items of noncompliance were identified.

7. Followup on IE Circulars

The inspector selected IE Circulars 81-07, Control of Radioactivity Contaminated Material, and 81-09, Containment Effluent Water That Bypasses Radioactivity Monitor, for review of the applicant's processing of Circulars. The applicant had received the two circulars and had reviewed them for applicability to their facility.

The inspector mentioned two comments during the exit interview. Regarding Circular 81-07, there appears to exist a minor discrepancy between the commitments made by the reviewer and the Supply System's policy document on Health Physics, Health Physics Program Description. The discrepancy has to do with maximum permissible removable alpha contamination. The applicant's representative agreed to review the apparent discrepancy.

Circular 81-09 had been referred to the applicant's prime contractor for review. The contractor's response consisted of a few sentences. This response was made after a four month delay to the Supply System's request. The inspector inquired as to what QA audits of the contractor's program for reviewing IE circulars had been conducted. He was informed that the program had not been audited in the past. The applicant's representative stated that a review of this program would be added to the list of items for future audits of the contractor. This matter was also discussed at the exit interview.

No items of noncompliance were identified.

8. Exit Interview

At the conclusion of the inspection, the inspector met with the persons denoted in Paragraph 1. The inspector summarized the purpose and scope of the inspection and discussed the inspection findings. Major topics discussed have been denoted throughout the inspection report. The Project Director stated that for the last few years the environmental program at the WNP-3 site had been an excellent one and that it was the Supply System's intention to maintain it that way. He also stated that the concerns expressed by the inspector would be reviewed.