

APPENDIX B

NOTICE OF DEVIATION

Washington Public Power Supply System  
P. O. Box 968  
Richland, Washington 99352

Docket No. 50-397  
Construction Permit No. CPPR-93

Based on the results of an NRC inspection conducted during the period August 9, 1982 to September 3, 1982 at the Washington Nuclear Project Number 2 (WNP-2) site, it appears that several of your activities were not conducted in conformance with your commitments to the commission as indicated below:

- A. Washington Public Power Supply System letter of June 18, 1981, (G02-81-146), from G. D. Bouchev to R. L. Tedesco concerning cable separation criteria at WNP-2, states that associated circuits shall be uniquely identified as such or as Class 1E, from Class 1E equipment up to and including an isolation device.

Contrary to the above, on August 31, 1982 it was determined that the Non-Class 1E power cables AM7A-9130, AM7A-9131, and AM7A-9132 and transformer TR-7A-C and other circuits which were associated with Class 1E Division 1 circuits by both lack of electrical isolation and lack of physical separation were not identified as associated circuits or as Class 1E circuits. Moreover, the Washington Nuclear Project No. 2 cable identification scheme, although providing identification for "Prime" cables (cables which at some point lack electrical isolation from Class 1E sources) or "9000 series - dual compatibility" cables (cables which at some point lack physical separation from Class 1E sources), does not uniquely identify that portion of these circuits that is associated with Class 1E divisions. As a result, associated circuits which require separation and installation in accordance with the requirements for Class 1E systems, cannot be identified so that control of activities affecting these circuits is maintained in accordance with 10 CFR 50, Appendix B requirements.

This is a deviation.

- B. Washington Public Power Supply System letter of June 18, 1981, (G02-81-146), from G. D. Bouchev to R. L. Tedesco concerning cable separation criteria at WNP-2 states that associated circuits shall remain with, or be physically separated the same as, those Class 1E circuits with which they are associated, from Class 1E equipment up to and including an isolation device. The accepted industry standard, Regulatory Guide 1.75, Revision 0, dated February 1974, states that Non-Class 1E circuits should be separated from associated circuits and Class 1E circuits by the minimum separation requirements for redundant Class 1E circuits. If Non-Class 1E circuits do not comply with these requirements the Non-Class 1E circuits should be treated as associated circuits.

Contrary to the above, on August 31, 1982 it was determined that associated power circuits AM7A-9130 and AM7A-9131 were directly connected to Non-Class 1E transformer TR-7A-C and other Non-Class 1E electrical circuits. Physical separation and electrical isolation of these associated circuits was not provided the same as those class 1E circuits with which they were associated."

This is a deviation.

- C. FSAR Amendment 23, figure 8.3-29a, defines 3 feet as the minimum horizontal separation requirement between any two redundant divisions in open tray, or where just one raceway is enclosed.

Contrary to the above, it was determined on September 1, 1982 that the required 3 feet horizontal separation was not provided for redundant safety Division 1, Division 2, and Division 3, and redundant BOP Division A and Division B cables routed in non-watertight, interlocked armor on the floor of the southwest corner of the control room. (These conduits were not identified by other than divisional markers).

This is a deviation.

- D. FSAR Amendment 23, Table 8.3-25 "Division markers for equipment, raceways, and cables external to PGCC" states that Non-Class 1E BOP Division B shall be identified with gold marker background colors and black character colors.

Contrary to the above, it was determined on September 1, 1982 that in the cable spreading room, tray section 7252, labeled S-Div-B in accordance with table 8.3-25 above, there were numerous cables identified with blue markers at approximately 5 foot intervals similar to PGCC Class 1E Division 2. FSAR table 8.3-25 does not provide for such markers external to the PGCC. There appeared to be no divisional markers for these cables in accordance with FSAR requirements throughout the approximately 75 to 100 feet of routing within the cable spreading room.

This is a deviation.

- E. FSAR Amendment 23, Table 8.3-25 "Division markers for equipment, raceways, and cables external to PGCC" states that Class 1E Division 1 equipment shall be identified with labels of yellow background color and black characters; Class 1E Division 2 equipment shall be identified with labels of orange background color and black characters, and Class 1E Division 3 equipment shall be identified with labels of red background color and black characters.

The Burns and Roe WNP-2 Project Criteria Document states in paragraph 3.6.1.25 that "equipment associated with the RPS, NSSS, and ESS shall be identified so that two facts are physically apparent to the operating and maintenance personnel: First, that the equipment is part of the nuclear safeguards system; and second, the grouping (or division) of enforced segregation with which the equipment is associated."

Contrary to the above, on September 2, 1982 it was determined that HPCS instrument panel H22-PO4 (ESS Division 3) was labeled with yellow background and black characters the identification scheme for redundant division 1; that RHR instrument panel H22-PO21 (ESS Division 2) was labeled with yellow background and black characters the identification scheme for redundant division 1, that (main steam isolation valve-leak control system) MSIU-LCS instrument panel IR-74 (Division 2), and MSIU-LCS instrument rack IR-73 (Division 1) were labeled with black background and white characters a method not appearing in the FSAR identification scheme for either BOP or PGCC equipment.

This is a deviation.

You are hereby requested to submit to this office within thirty days of the date of this notice, a written statement or explanation regarding each of the items of deviation, describing corrective steps taken, the results achieved (or corrective steps that are planned), and the date when corrective action will be completed.

ORIGINAL SIGNED BY  
R. T. DODDS

OCT 25 1982  
Date

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R. T. Dodds, Chief  
Reactor Project Section 2