

**Washington Public Power Supply System**

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000  
Docket No. 50-397

March 31, 1983  
G02-83-295

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REGION V 10-2

Mr. D. M. Sternberg  
Chief, Reactor Projects  
Branch No. 1  
U.S. Nuclear Regulatory Commission  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2  
NRC INSPECTION 82-21 - NOTICE OF VIOLATION  
AMENDMENT TO RESPONSE

Reference: 1) Letter, J. L. Crews to R. G. Matlock, dated October 27,  
1982.  
2) Letter, C. S. Carlisle to D. M. Sternberg, G02-82-958,  
dated December 2, 1982.

Washington Public Power Supply System hereby amends its previous response to Reference 1). Reference 2) responded to the subject Notice of Violation and Deviation in December 1982. This letter transmits in Attachment I a revised response to the Notice of Deviation, Item D. This reply is pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10 Code of Federal Regulations.

If you have questions or desire further information, please contact Doug Timmins at (509) 377-2501, extension 2942.

  
R. G. Matlock  
Program Director, WNP-2

DCT/jw

cc: W. S. Chin - BPA - 399  
J. A. Forrest - BRI - HAPO  
N. D. Lewis, NRC  
J. Plunkett, NUS Corp.  
A. Toth, NRC Resident Inspector (917Q)  
Document Control Desk, NRC  
WNP-2 Files (917B)

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ATTACHMENT I

WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
NUCLEAR PROJECT NO. 2  
DOCKET NO. 50-397  
LICENSE NO. CPPR-93

AMENDED RESPONSE TO INSPECTION REPORT 82-21  
NOTICE OF DEVIATION ITEM D

For purposes of clarity, the deviation is repeated followed by our response.

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.

Supply System Response

As a part of the PGCC design, there has been a need to interconnect the Main Control Room Balance of Plant (BOP) front benchboards with the vertical boards located at the back of the room. However, the PGCC ducts provided do not allow such routing to be practicable. As an alternate, a network of raceways has been used in the cable spreading room to route these interconnecting cables. The listing of these interconnecting cables which are routed in these raceways is documented on Burns and Roe drawing E766, sheets 8, 9 and 10. These cables are treated as an exception to the standard PGCC routing. As a minimum, they shall be identified with general plant markers while in the cable spreading room and with PGCC markers while in the PGCC. A cross-reference between the respective identification schemes will be available in the Burns and Roe design documents.

A statement of this exception will be included in a FSAR revision stipulating the cable identification requirements for these specific cables. In addition, Revision 2 of the Electrical Separation Practices document will address this exception.

Corrective Steps Taken

The FSAR and Electrical Separation Practices document will address this exception. An inspection and rework as necessary will be performed on the subject cables to ensure they comply with the above requirements.

Results Achieved

Clarification of electrical separation criteria with respect to the subject exception and compliance with current criteria.

Corrective Action Complete

The subject FSAR revision and Revision 2 of the Electrical Separation Practices document will be issued by April 15, 1983.