U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-397/84-17, 30-19590/84-01

Docket No. 50-397, 30-19590 License No. NPF-21, 46-17964-02

Licensee: Washington Public Power Supply System (WPPSS)
P. O. Box 968
Richland, Washington 99352

Facility Name: Washington Nuclear Project No. 2 (WNP-2)
Washington Nuclear Project No. 1 (WNP-1)

Inspection at: WNP-1 WNP-2 Site, Benton County, Washington

Inspection conducted: June 5 - June 8, 1984 and
June 25 - June 29, 1984

Inspectors: Conrad I Sherman 7/8/84
C. I. Sherman, Radiation Specialist Date Signed

Approved By: GP Yuhas 7/10/84
G. P. Yuhas, Chief Date Signed
Reactor Radiation Protection Section

Summary:

Inspection on June 5 - June 8, 1984 and June 25 - June 29, 1984 (Inspection Report Nos. 50-397/84-17 and 30 19590/84-01) and in office inspection effort July 1 - July 5, 1984

Areas Inspected: Routine, unannounced inspection of the licensee's response to previous violations and inspector identified items. Compliance with conditions of materials license 46-17964-02 was also examined.

The inspection involved 40 hours onsite by two regionally based inspectors during the period June 5 - June 8, 1984. Thirty five hours onsite by one regionally based inspector June 25 - June 29, 1984 and 15 hours of in office examination.

Results: Of the areas inspected, one apparent item of noncompliance was identified in one area (failure to maintain records of quarterly inventories of licensed material pursuant to a license condition), paragraph 4.

DETAILS

1. Persons Contacted

*G. Afflerbach, Assistant Plant Manager
D. Bennett, Radiochemist
J. Bovington, Health Physicist
R. Graybeal, Health Physics/Chemistry Manager
J. Martin, Plant Manager, WNP-2
R. Mazurkiewicz, Plant Manager, WNP-1
*V. Shockley, Health Physics/Chemistry Support Supervisor
L. Berry, Health Physics Supervisor
R. Hintz, Senior Health Physicist
J. Bovington, Senior Health Physicist
J. Allen, Health Physicist
J. Thomas, Startup Test Engineer
W. Flory, Health Physics Foreman
J. Horton, I&C Supervisor
*M. Mills, State of Washington, EFSEC
*P. Powell, WNP-2 Licensing Manager
*R. Corcoran, Plant Operations Manager
*R. Partrick, Plant Administration
*D. Walker, Plant QA Manager
*M. Monopoli, Manager, Operations Assurance Programs
*J. Shannon, Director Power Generation

*Indicates those individuals attending the exit interview on June 29, 1984.

2. Licensee Action on Previous Inspection Findings

(Closed)(83-16-01). Item regarding control on licensed material transported between the unit and the Plant Support Facility (PSF) on public roads within the restricted area. The licensee issued plant procedure 11.2.14.8; "Transfer of RAM between Facilities," controlling movement of licensed material. This procedure uses the DOT limits for radiation levels on the transport vehicle and establishes administrative requirements for transfers. The inspector noted that the contamination limits established are ten times the limits established in Table 10 of 49 CFR 173.443 and that this is acceptable provided certain provisions of §173.443 (contamination control) are complied with. The inspector had no further questions on this matter.

(Closed)(83-26-03). Open item involving ability to open high radiation area gates from inside without a key. The inspector verified that these gates have been modified to permit opening with a thumb latch. The inspector had no further questions on this matter.

(Closed)(83-23-58). Open item involving training of health physics/chemistry technicians on plant systems and on equipment that must be operated on backshifts. The inspector verified by review of records that health physics personnel have received the training described in Inspection Report No. 83-58, paragraph 2. The inspector had no further questions on this matter.

(Closed)(83-32-03). Open item regarding a procedure to implement the retraining requirement of ANSI 3.1-1978 paragraph 5.5. The inspector verified that administrative procedure 1.8.7 of the PPM has been issued to implement the retraining program. Areas to be covered in the retraining program include requalification, new equipment and advanced training where needed. Details in this area will be examined during the routine inspection program. The inspector had no further questions on this matter.

(Closed)(83-32-05). Open item regarding I&C procedures for calibration of portable survey instrumentation. The inspector verified that approved procedures are available for area radiation monitor maintenance, air samplers, sample counters, continuous air monitors (Eberline and NMC) and count rate meters. The licensee has obtained the services of an experienced individual to write I&C radiation monitoring instrument calibration procedures. The inspector has no further questions on this matter.

(Closed)(83-58-C1). Deviation involving placement of an RCS sample line in an occupied corridor. The inspector verified that surveys of this line were added to the routine plant survey program by procedure deviation form (PDF) to Step 11.2.24.1.5.C.2 of procedure 11.2.24.1 to perform contact gamma radiation measurements on the line at Radiation Base Point (RBP) location T3-20 and T1-47 and to the startup radiation measurement test procedure. In addition, PMR 02-84-1028, Rev. 0 has been initiated to reroute this sample line. This item is considered closed based on the additional surveys and licensee communications addressing the problem. The inspector has no further questions on this matter.

(Closed)(83-58-02) Open item regarding ALARA concerns involving a condenser offgas sample line. The inspector reviewed several documents including PED-S-215-M-7289 approved April 4, 1984 indicating that other sample lines can be used and that valves isolating this line would be locked closed. The valves OG-V-25A, OG-V-25B, OG-V-1A and OG-V1B on P&ID sheets M511 and M535 were identified to be locked closed. The PED identifies a GE document SIL-150 dated June 1981 which indicates these sample lines are not necessary. The inspector had no further questions on this matter.

(Closed)(83-58-03) Open item concerning the effect of a drywell spray header pipe shadowing an accident radiation monitor provided to meet the criteria of NUREG-0737-II.F.1-3. The inspector examined a memorandum dated March 6, 1984, Subject: Effect on procedure 9.3.30 of pipe in front of Drywell Loca Monitor, which concluded the effect would not cause an error greater than 10%. The inspector was advised that procedure 9.3.22 is the correct procedure number. The inspector had no further questions on this matter.

(Closed)(84-07-01) Open item identified an inspector concern as to the suitability of a calculational technique for determination of the Reactor Building Elevated Release Plenum radiation monitor setpoint. The inspector examined a calculational technique performed by NRR, MTEB and described in a letter dated April 17, 1984, C. Willis to R. Auluck and also examined the licensee's revised calculation, NE-02-84-14 approved

June 25, 1984. As part of this examination, the inspector verified a portion of the licensee calculation.

Based on review of calculational technique and the basis selected for the setpoint, the inspector concluded that the licensee's original setpoint was conservative and that the revised setpoint, while higher, would provide adequate margin for initiating the standby gas treatment system. The inspector has no further questions on this matter.

(Closed)(84-07-02) Violation resulting from downgrading of Quality Class 1 equipment in the radiation monitoring system. The licensee responded to this violation in letters dated May 10 and June 15, 1984. The June 15, 1984 letter identified corrective action to preclude further problems with quality classification of systems. Further, the licensee identified open items remaining in their independent review of systems 36, 37, 97 and 106. The inspector examined several of these items including FSAR changes and portions of the enhanced calibration program associated with ANSI 13.10 criteria. Examination of the enhanced calibration program is discussed in paragraph 5.

Based on this review, the inspector considered this matter closed.

3. Independent Inspection Effort

The inspector observed portions of an emergency exercise involving the Post Accident Sampling System. The inspector also toured the reactor and radwaste buildings and observed the operability of radiation monitoring instrumentation.

No violations or deviations were identified.

4. Unit 1 Material License

The Unit 1 Health Physics Manager (HPM), who also serves as Unit 2 Health Physics/Chemistry Support Supervisor was contacted in order to examine activities associated with Material License Number 46-17964-02.

The inspector verified that individuals identified in the license remain cognizant over activities. At this time no Unit 1 health physics staff is present and Unit 2 personnel are utilized as necessary. Audits performed by the licensee are under cognizance of Manager, Radiological Programs. No audits have been conducted since the license was issued. Posting of NRC Form 3, Part 19 and other items required by Part 19 were examined. Minor discrepancies related to posting were identified and promptly corrected by the licensee. License Condition 8.E related to quantity of materials was satisfied.

The inspector examined the source inventory which consists of 42 sealed Sr-90 sources used as "keep alive" sources in radiation detectors. These sources are stored in a locked safe. The sources are each approximately .58 μcuries for a total of 22.77 μcuries. Exempt sources are stored at Unit 2.

License Condition 14 requires that a quarterly physical inventory to account for all licensed material be performed and that records be maintained for 2 years. Based on discussion with the Unit 1 HPM, physical inventory surveys were conducted on June 13, 1983, December 1983 and February 1984. No records were available for the inventory surveys conducted in December and February. The HPM acknowledged that records were not made of the inventory surveys. Failure to maintain records of physical inventory surveys represents an apparent violation.

License Condition 15 requires that the licensee possess and use licensed materials in accordance with procedures contained in the application dated January 25, 1982. The inspector noted that procedures have undergone major changes and that a license amendment reflecting the new procedures should be sought. At the exit interview the licensee identified adequate corrective actions to ensure that quarterly source inventories would be conducted and indicated that all license conditions were reviewed to ensure regulatory requirements are met.

One apparent violation was identified in the area of a byproduct material license condition.

5. Enhanced Calibration Program

An ANSI 13.10, "Specification and Performance of On-site Instrumentation for Continuously Monitoring Radioactivity in Effluents" evaluation has been completed as described in the licensee's letter dated December 8 and December 9, 1983. Submittal of this evalution by July 1, 1984 was a condition of license.

The inspector examined portions of that evaluation for the following systems:

a. Reactor Building Low Range Effluent Monitor
b. Radwaste Building Low Range Effluent Monitor
c. Turbine Generator Building Low Range Effluent Monitor
d. Turbine Service Water Monitor
e. Turbine Generator Building Sump Monitor

In the evaluations examined, the licensee was able to show that installed radiation monitors could meet requirements of ANSI 13.10.

No violations or deviations were identified.

6. Exit Interview

An exit interview was conducted on June 29, 1984. Individuals in attendance are identified in paragraph 1. The scope and findings were discussed at this time. Regarding the apparent violation identified in paragraph 4, the licensee presented immediate corrective actions taken to prevent future violations.