

**Washington Public Power Supply System**

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

March 22, 1984

Docket No. 50-397

Mr. T. W. Bishop, Director  
Division of Reactor Safety and Projects  
U. S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

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Subject: NUCLEAR PROJECT NO. 2  
LICENSE NO. NPF-21  
NRC INSPECTION DECEMBER 5-31

Reference: Letter, TW Bishop (NRC) to GC Sorenson (SS),  
"NRC Inspection", dated February 22, 1984

Dear Mr. Bishop:

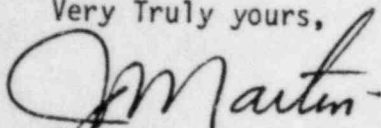
The Washington Public Power Supply System hereby replies to the Notice of Violation contained in Appendix A of your letter dated February 22, 1984. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, the corrective actions which have been taken and the results achieved are outlined, the corrective actions which will be taken to preclude recurrence are delineated, and the date when full compliance will be achieved is specified.

In response to your concerns as stated in the referenced letter regarding supervisory staff, a two-fold program is in place to correct any inadequacies: Plant Management is enhancing awareness of the procedural requirements, vis-a-vis, periodic training sessions for Maintenance supervision and is, additionally, increasing human resource allocation in this area due to greater-than-anticipated work load prior to commercial operation.

Should you have any questions concerning our response, please do not hesitate to contact me.

Very Truly yours,



J. D. Martin (927M)  
WNP-2 Plant Manager

Attachment

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## APPENDIX A

### CORRECTIVE ACTIONS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

1. Maintenance Work Requests were issued and completed to repair the valves in question. Specifically, MWR AY-0055 was issued on 1-6-84 to replace the valve stem on RHR-V-82; the work was completed 1-18-84 with a satisfactory operability test performed thereafter. MWR AY-0056 was issued on 1-6-84 to replace the packing follower on RHR-V-210; the work was completed on 1-18-84 with a satisfactory operability test performed thereafter.
2. Revision 4 of Plant Procedure 1.3.7 was inspecific and allowed for "grey zones" regarding responsibility for MWR's due to the transition of plant systems from a testing mode to an operational mode. The procedure was revised (Rev. 5) on 12-23-83 due to concerns by Plant Management regarding this and other areas. Revision 5 now effectively delineates responsibilities regarding MWR review prior to closure thus precluding the probability of such actions re-occurring. This revision requires a two-tier review by Maintenance supervision and the System Engineer prior to closure.
3. The Plant Quality Assurance Organization performed a surveillance of MWR's which were completed during the time period Revision 4 of the procedure was in effect for all Quality Class I Systems and selected Quality Class II Systems to identify problems similar to the one cited. The surveillance results are currently under evaluation by Plant Management and will be appropriately dispositioned by April 30, 1984.

### CORRECTIVE ACTIONS TO AVOID RECURRENCE

In addition to the corrective actions discussed above, Plant Management recognized that personnel do not automatically change their working habits due to changes in procedural requirements. MWR's completed from the day Revision 5 of the procedure became effective (12-23-83) until February 6, 1984 are additionally under review and will be completed by April 15, 1984.

In further recognition of this problem, ongoing training sessions are being held with responsible Plant Staff supervision to emphasize the need for "closing the loop" on Maintenance Work Requests as required by the procedure.

### DATE OF FULL COMPLIANCE

The training sessions on the revised procedure and its implications will be completed by April 30, 1984. The review and evaluation of MWR's for both Revision 4 and 5 of the procedure as delineated above will be completed, as well, by April 30, 1984. All other phases of this response are complete.

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