

U.S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-397/84-11

Docket No. 50-397

License No. CPPR-93

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

Facility Name: WNP-2

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

Inspection conducted: April 2-6, 1984

Inspectors:

*Dennis J. Willett*  
D. J. Willett, Reactor Inspector

5-16-84  
Date Signed

*Dennis Willett for*  
R. Kanow, Reactor Inspector

5-16-84  
Date Signed

*Dennis Willett for*  
T. Polich, Reactor Inspector

5-16-84  
Date Signed

Approved by:

*R. T. Dodds*  
R. T. Dodds, Chief, Reactor Projects  
Section 1

5-16-84  
Date Signed

Summary:

Inspection on April 2-6, 1984 (Report No. 50-397/84-11)

Areas Inspected: Routine, unannounced safety inspections of the Quality Assurance Programs for: startup testing, design changes and modifications, overall startup program, and maintenance; technical specification compliance; non-routine events review; and follow-up of TMI (NUREG-0737) items. The inspections involved a total of 28 onsite hours by three NRC inspectors.

Results: Of the seven areas inspected, one violation and no deviations were identified.

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## DETAILS

### 1. Persons Contacted

- \*J. D. Martin, WNP-2 Plant Manager
- \*G. K. Afflerbach, Assistant Plant Manager
- \*R. B. Glasscock, Director Licensing and Assurance
  - K. D. Cowan, Manager Plant Technical
  - J. F. Peters, Plant Administrative Manager
- \*D. H. Walker, Plant Quality Assurance Manager
- \*R. E. Partrick, Plant Administrative Engineer
- \*G. L. Blackburn, Planning and Scheduling Supervisor
- \*R. J. Barbee, Plant Engineering Supervisor
- \*C. H. McGilton, Nuclear Safety Manager
  - J. Landon, Plant Maintenance Manager
  - D. S. Feldman, Plant Quality Assurance Supervisor
  - R. L. Abbott, Senior Engineer
  - T. E. Custodia, Associate Test Engineer
  - J. D. Cooper, PMR/MWR Coordinator
  - D. Gano, Shift Technical Advisor

The inspector also talked with other licensee personnel during the inspections. These included plant staff engineers, technicians, administrative assistants, and document control personnel.

\*Denotes personnel present during the exit interview on April 6, 1984.

### 2. Operating Events Reporting

The program for identifying, reporting and reviewing of safety related operating events was examined. The following administrative controls and procedures were reviewed: Plant Procedures Manual (PPM) 1.3.12 "Plant Problems", Rev. 6, PPM 1.10.1 "Reportable Events and Occurrences Required by Regulatory Agencies", Rev. 4, and Technical Specifications Section 6 "Administrative Controls".

The Nonconformance Report (NCR) System was examined to verify proper implementation. The Plant Technical Manager's NCR Log was reviewed and a representative sample of NCR's were examined for completeness and/or tracking. Two incomplete NCR's 284-0057 and 284-0092 were selected for tracking. NCR 284-0092 was located and found to be complete. The licensee was unable to locate NCR 284-0057 although other documentation indicated that it was completed. The Plant Technical Manager said that he would recreate NCR 284-0057 from the file copy if further efforts to locate the original are unsuccessful. Plant procedures (including PPM 1.3.12) do not specify how to recreate or annotate an NCR if lost.

No violations or deviations were identified.

### 3. Design Changes and Modifications

#### a. Program Review

The inspector reviewed the Operational Quality Assurance Program description and the Plant Procedures Manual to ascertain the degree of compliance with the following requirements, standards and guides pertaining to design changes and modifications:

- 10 CFR 50 Appendix B, "Design Control"
- 10 CFR 50-59, "Changes, Tests and Experiments"
- Technical Specifications, Section 6.5, "Review and Audit"
- ANSI N45.2 "Quality Assurance Program Requirements for Nuclear Facilities"
- ANSI N45.2.11, "QA Requirements for the Design of Nuclear Power Plants"
- ANSI N18.7-1976 "QA for the Operational Phase of Nuclear Power Plants"
- Reg. Guide 1.33, "QA Program Requirements (Operations)"
- Reg. Guide 1.64, "QA Requirements for the Design of Nuclear Power Plants"

Based upon this review the inspector concluded that the applicant's program for controlling design changes and modifications established:

- Design or modification change request initiation method.
- Method that the proposed change doesn't involve an unreviewed safety question or a change in Technical Specifications.
- Responsibilities and methods for conducting safety evaluations.
- Responsibility for performing design work.
- Method of reporting design changes and modifications to the NRC.

#### B. Design Change Package (DCP) Review

The inspector reviewed the following Design Change Packages:

- DCP #02-84-0102-0 (incomplete package), "Replace Undersized fuse with name plate size".
- DCP #02-84-0012-0 (complete package), "(a) Install temporary pressure switch for RCIC-PS-21, (b) correct location of installed Banksdale pressure switch."

Based on this review, the inspector determined the following:

- The design changes were not being reviewed and approved in accordance with Plant Procedure Manual.
- The design changes were controlled by established procedures, but not implemented completely.
- In reviewing DCP #02-84-0102, the inspector noted that required review and evaluation documents (Design Change Review Form, Affected Plant/Design Document list, and Training Checklist) had not been completed, but were checklisted as being complete.
- The inspector reviewed DCP #02-84-0112-0 which authorized temporary replacement of a pressure switch (PS-21) on the suction of the RCIC pump (which alarms in the control room on high suction pressure-indicative of leaking injection valve). This switch was replaced with a Class-I type that was non-qualified seismically or radiologically, as had been the original. This temporary installation was approved by the Plant Operation Committee (POC) until a qualified replacement could be procured. The temporary switch was subsequently seismically qualified by a letter from the vendor, however, it was not radiologically qualified also. The licensee has, since the original system design and installation, decided not to conform to IEEE-323 the environmental standard, and as such will only maintain the radiological environmental qualifications of the RCIC isolation valves. This change package was closed out even through the ordered switch, which satisfied the original purchase specifications, was received.
- The POC failed to re-review package changes. Additionally, these records failed to include a written determination which provides the basis for the deciding that the change does not involve an unreviewed safety question. This is an apparent violation (84-11-01).

#### 4. Quality Assurance for the Startup Program

The inspector reviewed the Quality Assurance Program for startup activities. This examination included discussions with personnel and management responsible for program development and implementation. This review verified that the Quality Assurance Program had established and implemented procedures and methods for comprehensive inspections of startup activities on a regularly scheduled basis. These inspections are called surveillances and include such areas as: conduct of testing, tracking of test deficiencies, test documentation, control of measuring and test equipment.

The inspector examined the "Operational Quality Assurance Surveillance Report Log", which tracks and records the status of all QA surveillances, and selected the following surveillances for review:

- #S-2-84-059, "Surveillance Test Results Review and Reporting"
- #U-2-84-023, "Plant Procedure Revision Sign-Off Log"
- #U-2-84-034, "Maintenance Work Requests"

The inspector determined that surveillances were performed in accordance with the schedule, by appropriate personnel independent of direct responsibility for the activity being inspected. Additionally, the inspector confirmed that the surveillance results were reviewed with the appropriate level of management and any items requiring resolution were documented in accordance with program requirements.

No violations or deviations were identified.

#### 5. Overall Startup Test Program

The following formal administrative controls regarding procedures were reviewed:

- P.P.M. 1.2.4, Rev. 5 - "Plant Procedure Approval and Revision"
- P.P.M. 1.2.5, Rev. 5 - "Plant Procedure Distribution and Control"
- P.P.M. 1.2.6, Rev. 1 - "Periodic Review of Plant Procedures"

This examination verified that appropriate administrative controls, consistent with industry standards and regulatory requirements, have been instituted and implemented for control of the procedure review, approval, issue, and revision process. Additionally, the inspector confirmed that:

- Revisions are reviewed and approved by the same persons/groups that did the original.
- Obsolete procedures are controlled and dispositioned appropriately.
- Operating procedures are reviewed against the requirements of technical specifications.

No violations or deviations were identified.

#### 6. Quality Assurance Maintenance

The administrative controls for maintenance records, including: preparation, assembly, review, transfer and storage were reviewed. The record copies or maintenance work requests were retrieved from vault storage, and were balanced against the guidance contained in ANSI-18.7. This review was to determine the work requests conformance to the following parameters:

- Status of work requests
- Approvals
- Identification of individuals doing the work

- Identity of persons doing inspections
- Approvals of work
- Cause of failure
- Description of corrective actions
- Operability of the system or component
- Program for identifying repetitive failures

The inspector identified numerous blank forms, missing forms, missed entries, and questionable status.

The licensee stated that during the preoperational test phase, work requests were generated by operations staff and given, as information, to startup who would then performed the work under a Startup Work Request (SWR) or a Startup Deficiency Report (SDR). Now that the preoperational phase is completed, all work is done under a Maintenance Work Request (MWR). There are some records in the files that are not complete packages (have not married the MWR with the SWR and/or SDR).

The licensee stated that they would do a sample program review (10% of approximately 2000 estimated) of the MWR's generated prior to preoperational test program completion, to insure that their program (interim and transitional - startup to operations respectively) was adequate to disposition all preoperational phase MWR's - (information type). This issue and licensee's sample review will be followed up during a future inspection (84-11-02).

#### 7. Technical Specification Compliance

The inspector reviewed, on a sample basis, the minutes for the regularly scheduled and unscheduled Plant Operating Committee (POC) meetings during the period of January 4, 1984 to March 13, 1984. This review confirmed that the technical specification requirements (Section 6.5.1.2 through 6.5.1.8) had been appropriately addressed and implemented. The requirements verified included: quorum, meeting frequency, committee functions and membership.

No violations or deviations were identified.

#### 8. TMI (NUREG-0737) Activities

(Closed) Item II.D.3 This item requires that the reactor coolant system relief and safety valves shall be provided with either a positive indication in the control room derived from a reliable valve position detection device or a reliable indication of flow in the discharge pipe. The licensee has installed acoustic detectors (transducers), on the tail pipe of each safety/relief valve (SRV), which will detect vibrations caused by flow. The frequency and magnitude of the vibrations has a direct correlation with the percent valve opening and is displayed with a "not fully closed" alarm, in the control room. This instrumentation is seismically and environmentally qualified and is powered from a Class 1E source. A diverse backup indication is provided by thermocouples attached to the SRV discharge pipes. Additionally, the licensee has emergency procedures to aid the operator during SRV actuation.

(Open) Item III.D.3.4 This item requires that control room operators be adequately protected against the effects of an accidental release of toxic or radioactive gases and that the nuclear power plant can be safely operated or shut down under design basis accident conditions. Specifically, the licensee must provide documentation of the information described in item III.D.3.4 Attachment 1.

The licensee provided information for Attachment 1 sections (1), (3), (4), (5) and parts of section (2) in the FSAR section 6.4 and Technical Specifications. The remainder of the information required by Attachment 1 section (2) could not readily be produced or other references provided.

The licensee committed to provide a complete file which contains all information required by Attachment 1. This item will remain open until a future inspection can verify appropriate completion for all Attachment 1 section (2) information.

(Open) Item III.D.1.1: "Leakage Outside of Containment" This item requires a program to review systems for potential radioactive leakage paths, implement a program to reduce leakage through increased surveillance, and record actual measured leakage rates and report them to the NRC.

The licensee has implemented the following requirements:

- Review and identify systems for potential radioactive leakage paths.
- Developed written procedures to reduce leakage through increased surveillance.

Implementation of the third requirement cannot be completed until initial startup because required plant conditions cannot be met until this time.

No violations or deviations were identified.

#### 9. Exit Interview

The inspector met with representatives (denoted in paragraph 1) at the conclusion of the inspection on April 6, 1984. The scope and findings of this inspection, which were discussed during the exit interviews, are summarized in paragraph 1 through 8 of this report.