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Washington Public Power Supply System

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REGION VISE

Docket No. 50-397

July 26, 1984
G02-84-433


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

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION 84-13
MAY 1 - JUNE 5, 1984

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in Appendix A of your letter dated June 29, 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, an explanation of the violations is presented, the corrective steps taken with results achieved are outlined, and the dates of full compliance where applicable, are specified.

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


G. C. Sorensen
Manager, Regulatory Programs

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Attachment

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APPENDIX A

As a result of an inspection conducted during May 1 - June 5, 1984 of activities authorized by NRC Operating License NPF-21 and in accordance with provisions of NRC Enforcement Policy, 10 CFR 2, Appendix C, the following violations were identified.

A. Notice of Violation

"10CFR50.72(b)(2)(iii)(C) and (D) requires that "the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of. . .any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to: . . .(1) "Control the release of radioactive material" or (2) "Mitigate the consequences of an accident."

Contrary to the above, on April 11, 1984 the licensee failed to notify the NRC that both doors of the Primary Containment Personnel Airlock were simultaneously open for a moment thus defeating the airlock's intended function of controlling the release of radioactive material and mitigating the consequences of an accident if an accident were to occur.

This is a severity level IV violation (Supplement I)."

Validity of Violation

As stated in the Notice of Violation, both doors of the Primary Containment Personnel Airlock were simultaneously open for a moment on April 11, 1984. This condition was subsequently reported to the NRC on May 10, 1984 in LER 84-032. At the time of the event, the Plant was in Mode 2 (Startup) at less than 1% power (30 psig, 250°F).

This condition was documented on a Nonconformance Report which identified the problem of the interlock mechanism not being engaged and thus allowing both doors to be opened simultaneously. Although at least one door was reclosed and the interlock was immediately restored, the condition momentarily placed the Plant in two Technical Specification Action Statements (i.e., TSAS 3.6.1.1 and 3.6.1.3.a.1).

Upon closure of one door, TSAS 3.6.1.1 ("without Primary Containment Integrity, restore Primary Containment Integrity within one hour . . .") was no longer applicable. Similarly, upon restoration of the interlocks, the airlock system was restored to operable status and TSAS 3.6.1.3.a.1 no longer applied. Consequently, the NCR was initially dispositioned as not reportable since entering a TSAS does not require reporting if the conditions of the LCO and its associated Action Statement were met. The reporting requirements of 10CFR50.72(b)(2)(iii) were not recognized as applicable at the time.

At the time of the event the Plant was in the initial stages of its first heatup. Due to the limited operation of the core and subsequent absence of decay heat or fission products, the potential consequences of having both doors open simultaneously was insignificant. Therefore, the event posed no threat to the safety of the Plant or the public.

Corrective Steps Taken/Results Achieved

Containment integrity was immediately restored following the event and the airlock interlocks were restored.

Corrective Steps to be Taken

As a result of this event and that of April 17-19 involving airlock operation with the interlock inoperable, specific instructions have been provided to the operating crews to ensure that airlock operation is performed in accordance with regulatory requirements.

The failure to recognize this event as reportable in accordance with 10CFR50.72 is an isolated event. Operations crews have developed a working knowledge of the requirements of 10CFR50.72 and no further corrective action is planned.

Date of Full Compliance

The airlock interlocks are operable and containment integrity is being maintained in accordance with requirements.

B. Notice of Violation

"Technical Specifications section 6.8.1 requires that "Written procedures shall be established, implemented, and maintained covering the activities. . .referenced in Appendix A of Regulatory Guide 1.33 Revision 2." The FSAR Section 13.5.11 and 17.2, and the referenced operational Quality Assurance Program Topical Report WPPSS-QA-004, emphasize the licensee's commitment to the details of the Regulatory Guide. The RG-1.33 Part 1.c prescribes certain administrative procedures "Equipment Control (e.g. locking and tagging)" and the FSAR Section 13.5.1.3 clarifies that such administrative procedures include rules and instructions pertaining to clearance orders.

The Plant Procedure 1.3.8 Revision 6 requires:

- (1) In section 1.3.8.2.E: "A change of clearance status is made only after the Shift Manager has reviewed the proposed change and determined that the change does not compromise the initial clearance order. . . . The addition and/or deletion of tags will be recorded in the "Tag Location" section and the changes initialed by the Shift Manager."
- (2) In section 1.3.8.2.C.1.a: ". . .the Shift Manager will authorize release of the Clearance Order by the following procedure. . .a. Indicating "Redundant Verification" is required when the component is safety related or fire protection."

Contrary to the above, on March 28, 1984 addition of four tags (CRD-C-112, 101, 102, and 113) were made to each of three clearance orders (84-3-317, 318, and 319) for work on the control rod drive system hydraulic control units (HCU-4239, 4643, and 4207):

- (1) Without the changes initialed by the Shift Manager.
- (2) Without the "Redundant Verification Required" indicated on any of the three clearance orders.

This is a Severity Level IV violation (Supplement I)."

Validity of Violation

- (1) Additional tags were added to the clearance orders (84-3-317, 318, 319) in order to prevent recurrence of an RPS actuation (LER-028). These additions were made under specific direction of the Shift Manager.

The purpose of the restrictions on changes to clearance orders (PPM 1.3.8.3.E) is to 'ensure safe working conditions'. In the event of March 28, the clearance order had not yet been accepted by the craft personnel, the work was not yet authorized and changes could be made without threat to personnel safety.

Prior to acceptance by the requestor, the clearance order is a working document for use by Operations under the control of the Shift Manager. Upon acceptance, the document is considered complete and any subsequent changes are governed by section 1.3.8.3.E of PPM 1.3.8 requiring signoff by the Shift Manager.

Based on this we do not consider this item a violation of Plant procedures or a violation of our license.

- (2) The violation correctly identifies that the referenced clearance orders (84-3-317, 318 & 319) were authorized release without "Redundant Verification Required" as required for safety related equipment.

Corrective Steps Taken/Results Achieved

The requirements for redundant verification of correct equipment status for safety related and fire protection equipment has been emphasized to all individuals authorized to release clearance orders.

Corrective Steps to be Taken

This reply to the Notice of Violation will be placed in required reading for all personnel authorized to release clearance orders.

Date of Full Compliance

The corrective step to be taken will be completed 8/15/84.