



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

RECEIVED
NRC

1987 JAN 33 10:14

REGION V I&E

Docket No. 50-397

January 28, 1987

Mr. J.B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 86-25

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated December 29, 1986. Our reply pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A.

In Appendix A, an explanation of our position regarding the validity of the violation is provided.

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

Very truly yours,

G.C. Sorensen
Manager, Regulatory Programs

GCS:mgm

Enclosure

cc: Mr. R.T. Dodds, NRC-Site 901A
Mr. J.O. Bradfute - NRR

8703250270 870319
PDR ADOCK 05000397
Q PDR

APPENDIX A

As a result of the inspection conducted on July 14-18, August 5-29 and October 22-24, 1986, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violation was identified:

Condition No. 14 of Facility Operating License No. NPF-21 requires the licensee to maintain in effect all provisions of the approved fire protection program for the WNP-2 facility.

As part of the approved fire protection program, the licensee's Final Safety Analysis Report (FSAR) requires responsibility for implementation of the program be assigned to designated individuals and administrative procedures.

Licensee procedures 1.3.10 and EI 2.40 require the licensee's fire protection staff to review design changes affecting fire protection, to review hazardous work activities, and to investigate actual fires.

Contrary to the above, since the facility was licensed in 1984, the licensee failed to follow procedures in accordance with the stated requirements in that:

- a. Licensee fire protection staff had not performed reviews of certain plant design change packages affecting fire protection as set forth in paragraph 5.A of Inspection Report 50-397/86-25.
- b. Licensee fire protection staff had not performed reviews of welding and cutting activities as set forth in paragraph 5.B(1) of Inspection Report 50-397/86-25.
- c. Licensee fire protection staff had not investigated and maintained records of actual fires that occurred as set forth in paragraph 5.B(2) of Inspection Report 50-397/86-25.

This is considered a Severity Level IV Violation (Supplement 1.D).

Validity of Violation

- a. The Supply System acknowledges the validity of this part of the violation in that reviews of certain plant design change packages were not performed as required by Engineering procedures.
- b. The Supply System does not acknowledge the validity of this part of the violation. As required by Section 1.3.10.5.E of Plant Procedure 1.3.10, "Fire Protection Program," the Industrial Safety and Fire Protection Group reviews Maintenance Work Requests (MWRs) on a random basis. Items reviewed include work actions for preplanning and proper permit usage.

In addition, these items are also reviewed as part of the monthly inspection program, and then checked in the Plant. Although the Supply System does not acknowledge the validity of this part of the violation, it is recognized that the process of reviewing welding and cutting activities needs to be strengthened; therefore, the procedure will be revised accordingly.

- c. The Supply System acknowledges the validity of this part of the violation.

Corrective Steps Taken/Results Achieved

- a. Nonconformance Report (NCR) 286-0394 was written on September 15, 1986. The NCR documented the problem of modifying a window in the Shift Manager's Office without an approved design package (reference Plant Modification Record 02-86-0343-0).

Design Change Package (DCP) 85-0115-0B, which addresses the installation of an alarm system for the fire protection sprinkler system in the Rad-waste System Truck Bay area, has been reviewed and approved by the Industrial Safety and Fire Protection Group.

All other design changes identified in this violation are in the process of being reviewed by the Industrial Safety and Fire Protection Group. It is anticipated that the review will be completed by March 2, 1987.

Engineering Instruction 2.40, "Instructions for Special Design Review," has been revised to ensure that all fire protection-related DCPs and Basic Design Changes (BDCs) are reviewed and approved by Industrial Safety and Fire Protection personnel.

- b. Plant Procedure 1.3.10 is currently being modified to strengthen the welding and cutting activities review process (see "Corrective Action to be Taken", item b).
- c. An agreement between Plant Technical, Plant Operations and Industrial Safety and Fire Protection personnel has been established with regard to what constitutes a fire in terms of an investigation standpoint.

Regarding other actions performed as related to this violation, it should be noted that the Supply System is currently in the process of reevaluating the Fire Protection Program requirements and methods to ensure compliance. A formal report is expected to be submitted to NRC, Region V, management by February 27, 1987. (Reference Supply System Letter G02-87-001:G.C. Sorensen to J.B. Martin: Dated 1/2/87.)

Corrective Action to be Taken

- a. A DCP is being prepared to replace the current window with a special fire-rated window and perform the modifications associated with Plant Modification Record 02-86-0343-0. The DCP will be reviewed and approved by the Industrial Safety and Fire Protection Group.

Plant Procedure 1.3.10 is currently being revised to ensure that all DCPs and BDCs are reviewed, by Industrial Safety and Fire Protection, for fire protection program impact.

- b. Plant Procedure 1.3.10 is currently being revised to ensure that reviews of welding and cutting activities are adequately performed. Specifically, the Plant Maintenance Manager will be responsible for taking followup action to assure closeout of "Transient Combustibles Permits" and "Cutting-Welding-Grinding Permits" which have exceeded the specified time limit. The Industrial Safety and Fire Protection Group will be required to audit MWRs, on a random basis, to determine if adequate preplanning for impairments, hazards work, etc., have been included in the work instructions.

The revision in process also establishes a new position of "Fire Marshall." Responsibilities of the Fire Marshall will include:

- Performing periodic reviews of welding and cutting activities.
- Stopping any work which does not meet fire protection requirements.

- c. Plant Procedure 1.3.10 is currently being revised to ensure that fires are promptly investigated and reported. A fire is now defined as "any instance of destructive and uncontrolled burning; including explosion of combustible solids, liquids or gases.

The Shift Support Supervisor will be responsible for notifying Industrial Safety and Fire Protection personnel of all fires, explosions or related incidents, including unplanned fire protection impairments. The Industrial Safety and Fire Protection Group will be responsible for investigating fires, explosions or malfunctioning fire protection equipment to determine cause.

Date of Full Compliance

- a. The window in the Shift Manager's Office will be replaced with a special fire-rated window by January 1, 1988. (This is due to the long lead time required to procure such a window.)

Plant Procedure 1.3.10 will be revised by April 1, 1987.

- b. Corrective action will be completed by April 1, 1987.
- c. Corrective action will be completed by April 1, 1987.