

ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

February 2, 2000
GO2-00-021

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 99-13,
RESPONSE TO NOTICE OF VIOLATION**

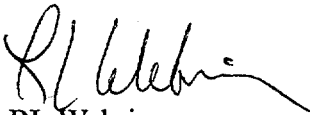
Reference: Letter dated December 22, 1999, LJ Smith (NRC) to JV Parrish (Energy Northwest),
"NRC Inspection Report No. 50-397/99-13 and Notice of Violation"

Energy Northwest's response to the referenced Notice of Violation, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, is enclosed in the attachment.

The reference was received by Energy Northwest after the holidays. Extension of the date for this response was agreed upon in a telephone discussion between LJ Smith (NRC Branch Chief) and PJ Inserra (WNP-2 Licensing Manager).

Should you have any questions or desire additional information regarding this matter, please call me or PJ Inserra at (509) 377-4147.

Respectfully,



RL Webring
Vice President, Operations Support/PIO
Mail Drop PE08

Attachment

cc: EW Merschhoff - NRC RIV
JS Cushing - NRC NRR
Sr. Resident Inspector - NRC/927N

TC Poindexter - Winston & Strawn
DL Williams - BPA/1399

IE01

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RESTATEMENT OF VIOLATION

In a letter dated June 1, 1998, the NRC informed the licensee that the reactor core isolation cooling system was inappropriately downgraded to nonsafety status in 1985 and that the condition constituted an unreviewed safety question pursuant to 10 CFR 50.59. The problem was a nonconformance and a condition adverse to quality

10 CFR Part 50, Appendix B, Criterion XVI states, in part, that: "Measures shall be established to assure that conditions adverse to quality, such as . . . nonconformances are promptly . . . corrected."

Contrary to the above, as of October 15, 1999, the inspector identified that the licensee had not taken measures to assure that a condition adverse to quality was promptly corrected. The unreviewed safety question described above was not properly addressed, in that the reactor core isolation cooling system keepfill pump and barometric condenser level switch were not upgraded to safety-related status, and the justification for maintaining the nonsafety status was inadequate

This is a Severity Level IV violation (Supplement 1) (50-397/99013-01).

RESPONSE TO VIOLATION

Energy Northwest accepts this violation.

REASON FOR VIOLATION

During the recent safety classification upgrade effort for the Reactor Core Isolation Cooling (RCIC) System, the RCIC keepfill pump was not upgraded to have an "active" safety-related classification because of reliance on an inadequate engineering analyses (as documented in Technical Memo 2071, dated October 6, 1994). Energy Northwest agrees with the staff's assessment that the technical memo did not appropriately consider all of the guidance provided by EPRI NP-6766, Volume 5, Part 1, "Water Hammer Prevention, Mitigation, and Accomodation," July 1992. The RCIC keepfill pump is currently classified as safety-related "passive" in that it maintains pressure integrity to prevent piping leakage or rupture.

We also agree with the staff that the calculation used to support the non-safety-related classification of the RCIC barometric condenser level switch did not conservatively consider all probable sources of leakage into the RCIC pump room.

In both cases the cause is determined to be the use of inadequate or incomplete design inputs and analysis methods.

The NRC inspector has characterized this issue as a weakness in our effort to upgrade the RCIC system to safety-related in response to a 1998 finding that RCIC had been inappropriately

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downgraded. The approach used during the upgrade effort was to evaluate the classification of every component in the system and where independent technical justification for the classification existed (i.e. the justification was not based on the non-safety-related classification of the system overall) the component classification was maintained. A detailed review of the technical justification was not performed to ensure that all assumptions were thorough, accurate, and complete. This was considered an appropriate approach to that effort since the intent was to reverse the downgrade performed in 1985. Those components that already had an independent technical justification with respect to their classification or qualification were assumed to be correctly dispositioned and as such were not systematically verified.

Accordingly, the cause of this issue is not related to the upgrade effort, but to the preparation of the analyses in question. In both cases the cause is determined to be use of inadequate or incomplete design inputs and analysis methods as outlined by the NRC inspector in the Notice of Violation.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A Follow-up Assessment of Operability was performed for the RCIC keepfill pump. It was concluded that the keepfill pump is "operable but non-conforming" to safety-related "active" classification standards. The RCIC system is also operable, and is not affected by the present safety classification of the keepfill pump. The RCIC keepfill pump is currently considered as a required support function component for RCIC system operability.

The calculation used to support the non-safety-related classification of the RCIC barometric condenser level switch was revised to include expected leakage into the RCIC pump room from other sources. The level switch can still remain classified as non-safety-related because the revised leakage into the RCIC pump room still does not impact RCIC system operability.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The classification of the RCIC keepfill pump will be re-evaluated to determine the appropriate safety classification. Accordingly, a new Component Classification Evaluation Record (CCER) will be developed to reflect this analysis.

A representative sample of RCIC components that are currently classified as non-safety-related or safety-related "passive" will have their CCER documents reviewed to ensure that the classification is appropriate. This review will be completed by April 30, 2000.

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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Regarding the RCIC barometric condenser level switch, full compliance was confirmed on January 27, 2000 when the revised engineering calculation substantiated that the failure of the level switch would not impact RCIC system operability. Therefore, the non-safety-related classification of this component was appropriate.

The RCIC keep fill pump classification will be finalized by March 31, 2000, including the development of a new CCER and identification of follow-on actions resulting from any permanent change in safety classification.