

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-397/86-31
Docket No. 50-397
License No. NPF-21
Licensee: Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352
Facility Name: WNP-2
Hanford, Washington

Inspection conducted: August 28, 1986

Prepared by: Philip Qualls
P. M. Qualls, Reactor Inspector

9/17/86
Date Signed

Approved By: P. H. Johnson
P. Johnson, Chief
Reactor Projects Section 3

9/17/86
Date Signed

Summary:

An Enforcement Conference was held on August 28, 1986. The following topics were discussed.

1. Apparent violations identified during the inspection of the WNP-2 Nuclear Plant's Equipment Qualification Program. (Inspection Report No. 50-397/86-12).
2. Apparent violations identified during the Region V team inspection (Inspection Report No. 50-397/86-11).
3. Repeat violations in control of combustible materials (Inspection Report 50-397/86-22) and in tool control (Inspection Reports 50-397/85-20 and 86-21).
4. Matters of concern to the NRC.

The recent Systematic Assessment of Licensee Performance (SALP) for the WNP-2 facility was also discussed.

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DETAILS

1. Enforcement Conference Participants

NRC Participants

J. B. Martin, Regional Administrator
B. H. Faulkenberry, Deputy Regional Administrator
D. Kirsch, Director, Division of Reactor Safety and Projects
A. Chaffee, Deputy Director, Division of Reactor Safety and Projects
A. Johnson, RV Enforcement Officer
F. Wenslawski, Chief, Emergency Preparedness and Radiological Protection Branch
P. Johnson, Chief, Projects Section III
G. Yuhas, Chief, Facilities Radiological Protection Section
R. Dodds, WNP-2 Senior Resident Inspector
R. Barr, WNP-2 Resident Inspector
J. Burdoin, Reactor Inspector
D. Willett, Reactor Inspector
P. Qualls, Reactor Inspector

WPPSS Participants

C. R. Duffie, Executive Board
D. Mazur, Managing Director
J. Shannon, Deputy Managing Director
J. Martin, Assistant Managing Director, Operations
J. Burn, Director, Engineering
R. Glasscock, Director, Licensing and Assurance
G. Bouchey, Director, Support Services
C. Powers, WNP-2 Plant Manager
J. Paker, WNP-2 Assistant Plant Manager
D. Feldman, WNP-2 Plant QA Manager
R. Kurzawa, Bargaining Unit Representative

State of Washington

B. Miller, EFSEC - Certificate Compliance Commission
M. Mills, Compliance Manager

Bonneville Power Administration

D. Williams, Nuclear Engineer

2. Enforcement Conference

On August 29, 1986, an enforcement conference was held at the NRC Region V office in Walnut Creek, California, with the individuals listed as identified in paragraph 1, above. The conference was in regard to apparent violations identified during the equipment qualification team inspection and the recent Region V team inspection, and the control of combustible materials as discussed in Inspection Report 86-22. The

conference was announced in a letter to the licensee dated August 25, 1985.

Mr. Jack Martin informed the licensee of the outline and scope of the conference. Messrs. Kirsch, Dodds and P. Johnson then outlined for the licensee the various specific violations and concerns which were to be the subject of the conference. These included:

- a. Repeat violations in the areas of:
 - 1) Control of combustible materials
 - 2) Control of measurement and test equipment including apparent violations in the control of HP test and measurement equipment
 - 3) Tool inventory, tool control and cleanliness control involving work on open systems

- b. Apparent violations from the Equipment Qualification team inspection including:
 - 1) Missing conduit plugs in Rosemount Model 1181 pressure transmitters
 - 2) Limitorque motor operated valve operator deficiencies
 - 3) Equipment Qualification of Rockbestos cables
 - 4) Improper documentation of Westinghouse containment penetration tests
 - 5) Several procedural deficiencies

- c. Violations identified during the June 1986 Region V team inspection

- d. NRC concerns based on the above violations, including:
 - 1) The effectiveness of licensee corrective actions for violations and identified deficiencies
 - 2) A perceived difficulty in implementing plant procedures
 - 3) NRC's perception that the licensee QA/QC organization has strained resources, is understaffed, has no detailed plan to review corrective maintenance and needs to be more aggressive in inspecting corrective maintenance

Mr. J. B. Martin emphasized the need for effective attention to identified weaknesses and adherence to facility procedures. He also stressed the importance of active management involvement and followup to ensure that management's expectations are properly understood and implemented by Supply System personnel.

Mr. A. Johnson then discussed the NRC enforcement policy.

Mr. J. Baker proposed and the NRC agreed to a meeting at an unspecified later date between the NRC and licensee technical experts on Equipment Qualification issues. Mr. Baker also stated the Dow Corning Silicon Foam had been applied inside the Rosemount transmitters in March 1986 such that they met equipment qualification requirements. When queried by NRC representatives concerning the acceptability and testing of this method,

licensee management indicated that this was tested and acceptable, and that additional written information would be provided.

Mr. D. Mazur then stressed the Supply System's commitment to ensure that operation of WNP-2 is safe, effective, and consistent with NRC requirements.

Messers C. Powers, J. Baker and D. Feldman discussed the licensee's plan for long term program upgrades as outlined in the attachment.

Mr. Mazur then gave the concluding remarks for the licensee.

Mr. J. B. Martin noted that the enforcement conference, as conducted, had also encompassed the scope of matters to be discussed regarding the latest Systematic Assessment of Licensee Performance (SALP) for WNP-2, and that a separate meeting would not be convened for that purpose. He then made concluding remarks, and the meeting was adjourned.

ENFORCEMENT CONFERENCE
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
AUGUST 28, 1986

- I. OPENING REMARKS

- II. ENFORCEMENT CONFERENCE ISSUES
 - Management Involvement
 - Housekeeping
 - Fire Protection
 - Responsiveness to Identify Deficiencies
 - Quality Control Program

- III. MANAGEMENT INVOLVEMENT OVERVIEW

- IV. SPECIFIC IN-LINE MANAGEMENT MEASUREMENT CONTROL
 - Housekeeping
 - Fire Protection (transient combustion control)
 - Measurement and Test Equipment
 - Tool Control

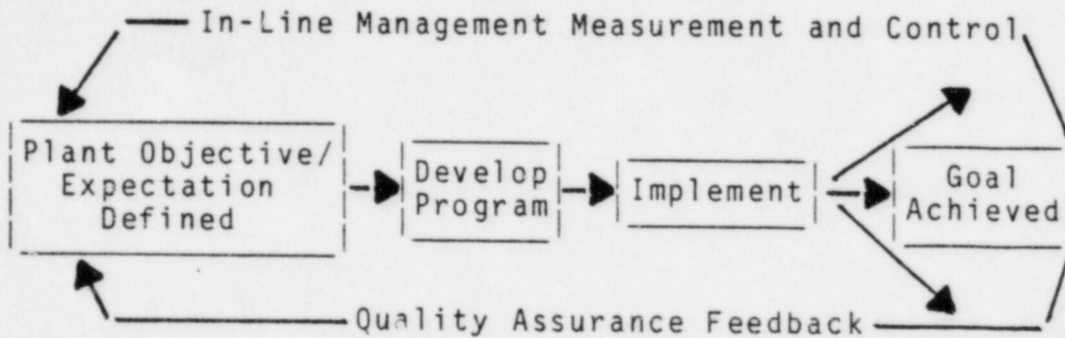
- V. QUALITY ASSURANCE FEEDBACK
 - Independent Informal Feedback
 - Surveillance Deficiency Reporting
 - Minimum Quality Control Inspection Program

- VI. SUMMARY REMARKS

II. ENFORCEMENT CONFERENCE ISSUES

- o Management Involvement in Plant Operations
- o Housekeeping Performance
- o Fire Protection Control of Transient Combustibles
- o Responsiveness to Identified Deficiencies
- o Minimum Quality Control Inspections of Corrective Maintenance Activities

III. MANAGEMENT INVOLVEMENT OVERVIEW



Management Initiatives to Improve Measurement and Control:

- o **Corporate Goals and Objectives Strive for Excellence**
 - Periodic Directorate Reviews Focus on Performance Feedback

- o **Plant Specific Goals Formulated to Achieve Corporate Goals**
 - Periodic Plant Department Reviews Focus on Performance

- o **Organizational Realignments to Increase Supervision of Major Work Control Functions**

OBJECTIVE: HOUSEKEEPING (clean "under the carpet")

PROGRAM/IMPLEMENTATION CHANGES:

- o Weekly inspections
- o Identify individual floor assignments/accountability
- o More involvement by first-line supervisor/foreman to ensure proper housekeeping during and after a job
- o Formalize plans to hire temporary laborers with adequate Health Physic's coverage to support cleanup/decontamination of the Plant
- o Issue management expectation letter along with shop talks to clearly define our expectations to site employees

FEEDBACK:

- o Monthly inspections by Plant Manager's Office with "concern" expert, i.e., fire protection, equipment qualification, inspect inside electrical gear, M&TE, administrative processes, NRC, etc.
- o Unannounced periodic inspections by corporate officials
- o Plant Manager's Office will tour other Region V Plants to identify potential "good practices" which can be applied to WNP-2

OBJECTIVE: FIRE PROTECTION (transient combustion control)

PROGRAM/IMPLEMENTATION CHANGES:

- o Inspection identified in housekeeping
- o Reevaluation of program requirements
- o Actively determine reason for error:
 - o Knowledge -- train
 - o Lack of commitment -- discipline
 - o Support Service Contractor -- fee

FEEDBACK:

- o Weekly/monthly inspections
- o Bi-weekly inspections by Fire Protection Engineer with required responses by violators

OBJECTIVE: TOOL CONTROL

PROGRAM/IMPLEMENTATION CHANGES:

- o Tool crib attended 24-hours a day
- o Color coded tools
- o Personalized tool chits -- one tool = one chit

FEEDBACK:

- o Plant inspections
- o Periodic audit of outstanding tool chits

OBJECTIVE: MEASUREMENT AND TEST EQUIPMENT (M&TE)

PROGRAM/IMPLEMENTATION CHANGES:

- o All M&TE activities consolidated under a single supervisor
- o Maintenance Engineer hired to oversee day-to-day operations and track compliance
- o Computerized check-in/check-out program
- o M&TE traveler card developed
- o Administrative procedure revised to clearly identify responsibilities
- o Tool crib attended 24-hours a day
- o Verification of M&TE inventory

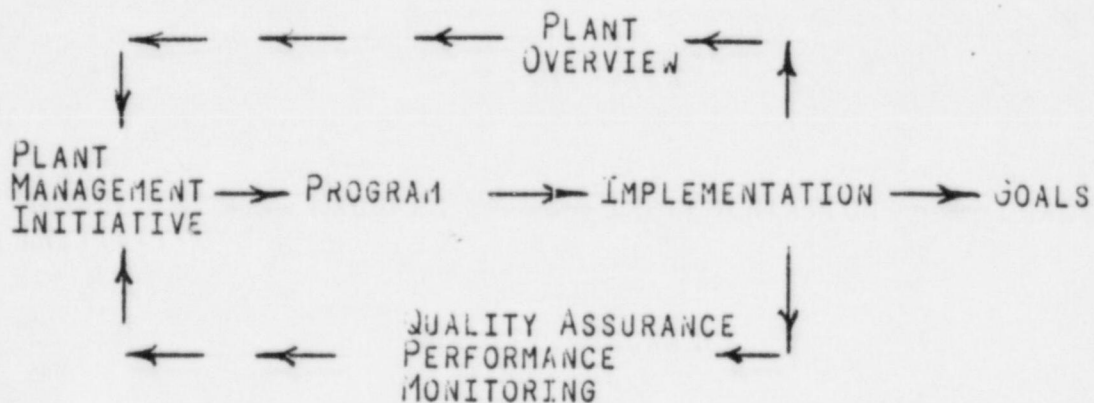
FEEDBACK:

- o Plant inspections
- o Weekly report of discrepancies

QUALITY ASSURANCE PROGRAM IMPROVEMENTS

PERFORMANCE FEEDBACK:

- ENHANCE QA SURVEILLANCE PROGRAM TO INCLUDE ROUTINE OBSERVATION OF MAINTENANCE WORK ACTIVITIES WITH IMMEDIATE FEEDBACK TO PERFORMERS AND/OR SUPERVISION. (10-15-86)
- IMPLEMENT A MONITORING PROGRAM OF PLANT INITIATIVES AND IMPROVEMENT PROGRAMS TO PROVIDE DIRECT FEEDBACK TO PLANT MANAGEMENT ON EFFECTIVENESS. (9-30-86)



WNP-2 PLANT QA

QUALITY CONTROL

EXISTING PROGRAM CONSISTS OF:

INSPECTION:

A PROGRAM OF HARDWARE INSPECTIONS TO VERIFY COMPLIANCE TO INSTALLATION PROCEDURES AND DESIGN REQUIREMENTS. DETAILED INSPECTION PLANS FOR MODIFICATION ACTIVITIES ARE FORMALLY ESTABLISHED EQUIVALENT TO CONSTRUCTION. CORRECTIVE MAINTENANCE INSPECTIONS ARE RANDOM WITH LEVEL OF INSPECTION BASED ON QUALITATIVE ATTRIBUTES.

DOCUMENT REVIEW:

REVIEWS OF WORK DOCUMENTS TO DETERMINE QC INVOLVEMENT AND PLAN INSPECTION ACTIVITIES.

QUALITY ASSURANCE PROGRAM IMPROVEMENTS

PLANT RESPONSIVENESS TO QA/QC CONCERNS:

- REFORMAT MONTHLY REPORT TO HI-LITE QA/QC CONCERNS AND PROVIDE FOLLOWUP STATUS OF PREVIOUS CONCERNS TO PLANT MANAGEMENT AND LICENSING & ASSURANCE MANAGEMENT. (9-15-86)
- INCREASE LICENSING AND ASSURANCE MANAGEMENT INVOLVEMENT IN DAILY WNP-2 PLANT QA ACTIVITIES. (9-1-86)
- IMPROVE COMMUNICATIONS BETWEEN PLANT QA AND PLANT MANAGEMENT REGARDING QA SURVEILLANCE DEFICIENCIES. (9-15-86)

QUALITY CONTROL PROGRAM IMPROVEMENTS

INSPECTION OF CORRECTIVE MAINTENANCE:

- DEVELOP A BASELINE CM INSPECTION PROGRAM FOR CRITICAL PLANT COMPONENTS. (11-15-86)
- REFINE INSPECTION ATTRIBUTES APPLIED TO CORRECTIVE MAINTENANCE. (2 YEAR PHASE-IN STARTING 2-1-87)
- DEVELOP A SAMPLING INSPECTION PROGRAM FOR OTHER-THAN-CRITICAL COMPONENTS. (FINALIZE BY 9-15-87)
- PROVIDE INTERIM BASELINE INSPECTION AND ATTRIBUTES FOR CORRECTIVE MAINTENANCE. (9-1-86)

INSPECTION OF PREVENTIVE MAINTENANCE:

- ENHANCE EXISTING QUALITY CONTROL INSPECTION PROGRAM FOR IMPORTANT PREVENTIVE MAINTENANCE. (4-1-87)

QUALITY CONTROL PLANNING AND EFFECTIVENESS

- IMPROVE EFFICIENCY AND EFFECTIVENESS OF THE QUALITY CONTROL GROUP BY SEPARATING INSPECTION PLANNING AND MONITORING FROM INSPECTION PERFORMANCE. (12-1-86)

VI. SUMMARY REMARKS

- o Involve Senior Management Representative More Frequently in WNP-2 Activities
- o Provide Periodic Feedback to NRC Regional Management on Management Effectiveness