

ENCLOSURE 1

NOTICE OF VIOLATION

Washington Public Power Supply System  
Washington Nuclear Project-2

Docket No.: 50-397  
License No.: NPF-21

During an NRC inspection conducted on April 26 through June 6, 1998, five violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. WNP-2 Technical Specification 5.4.1.a requires written procedures to be established, implemented, and maintained for the activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Appendix A to Regulatory Guide 1.33 recommends, in part, written procedures for reactor disassembly and refueling.

Plant Procedure 10.3.21, Revision 3, "Reactor Pressure Vessel Disassembly," requires heavy load and critical lift movements to be controlled in accordance with Procedure 10.4.12, Revision 9, "Crane, Hoist, Lifting Device and Rigging Program Control."

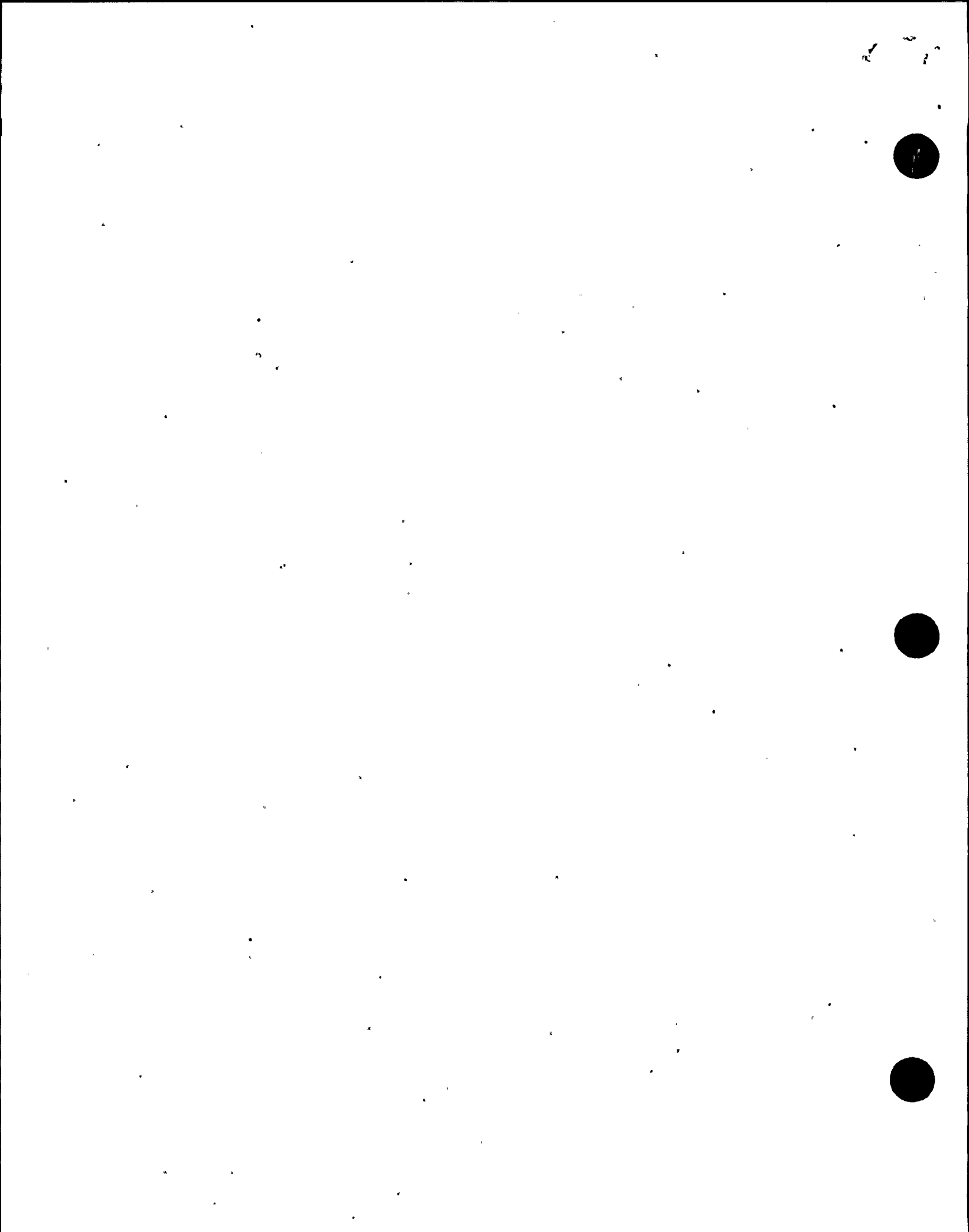
Plant Procedure 10.4.12 requires temperature on the refueling floor to be greater than 64°F prior to lifting loads of greater than 50 tons with the reactor building overhead crane. If minimum temperature requirements cannot be satisfied, the procedure requires contacting the rigging system engineer.

Contrary to the above, on April 17, 1998, prior to removing the reactor cavity shield blocks, each weighing approximately 100 tons, the licensee failed to ensure that refueling floor temperature was greater than 64°F and failed to contact the rigging system engineer. A local temperature monitoring device was unavailable on the refueling floor.

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

- B. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, deficiencies, and deviations, are promptly identified and corrected.

Contrary to the above, on April 23, 1998, the licensee failed to take prompt and adequate corrective action for a condition adverse to quality. Specifically, on April 23, 1998, when the licensee found that an Asea Brown Boveri fuel assembly (WAC076) was not fully inserted in its spent fuel pool storage location (A10), the licensee failed to identify operability concerns with regards to the spent fuel criticality analysis, as



described in the WNP-2 Final Safety Analysis Report. For criticality safety the analysis assumes that the Asea Brown Boveri fuel assemblies are fully inserted into their fuel storage locations.

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

- C. WNP-2 Technical Specification 5.4.1.a requires written procedures to be established, implemented, and maintained for the activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Appendix A to Regulatory Guide 1.33 recommends, in part, written procedures for the performance of surveillances required by Technical Specifications.

Plant Procedure ISP-EFC-B108, Revision 0, "Excess Flow Check Valve Test of Containment Atmosphere And Suppression Pool Level Instrument Sensing Lines," and Plant Procedure ISP-EFC-B102, Revision 1, "Testing Excess Flow Check Valves For Main Steam Leakage Control," provide procedural guidance for implementing, in part, Technical Specification Surveillance Requirement 3.6.1.3.8.

Contrary to the above, between May 19 and 26, 1998, the licensee failed to properly implement procedural requirements for testing excess flow check valves in that:

1. While performing Plant Procedure ISP-EFC-B108, technicians failed to isolate reactor protection system pressure Switch RPS-PS-4, in accordance with Steps 7.8.8 and 7.8.9, resulting in an unexpected half scram;
2. While performing Plant Procedure ISP-EFC-B102, technicians failed to perform independent verifications when locating drain manifold Valves 42 and 50, in accordance with Steps 7.3.18 and 7.3.16, respectively.

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

- D. WNP-2 Technical Specification 5.4.1.a requires written procedures to be established, implemented, and maintained for the activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Appendix A to Regulatory Guide 1.33 recommends, in part, written procedures for the performance of surveillances required by Technical Specifications.

Plant Procedure ISP-EFC-B103, Revision 0, "Excess Flow Check Valves Testing of Jet Pump, Reactor Pressure Vessel Drain and Core Plate Flow," and Procedure ISP-EFC-B102, Revision 1, "Testing Excess Flow Check Valves For Main Steam Leakage Control," provide procedural guidance for implementing, in part, Technical Specification Surveillance Requirement 3.6.1.3.8.



Contrary to the above, procedures for performing testing on excess flow check valves to satisfy Technical Specification Surveillance Requirement 3.6.1.3.8 were inadequate in that:

1. The demineralized water supply, defined by Plant Procedure ISP-EFC-B102 to be utilized for testing of excess flow check Valve PI-EFC-X18B, will not provide the required pressure for the test;
2. Procedure ISP-EFC-B103 fails to provide adequate instructions for backfilling instrument lines associated with excess flow check Valves PI-EFC-X44Be and PI-EFC-X44Bi. As a result, an improper lineup was established to a common instrument line which resulted in Division I and Division III EFS actuations.

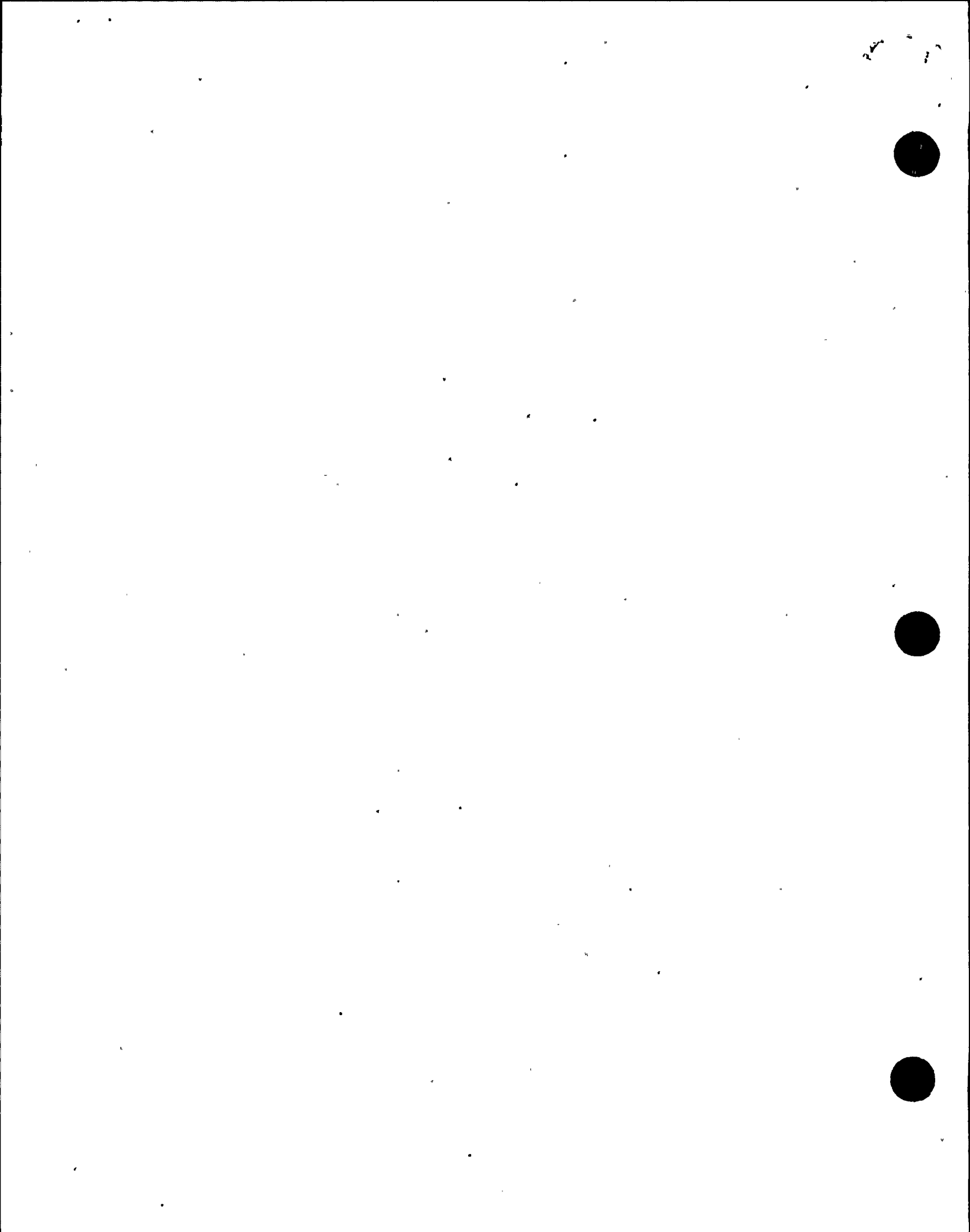
This is a Severity Level IV violation (Supplement I).

- E. 10 CFR 50.54(q) permits licensees to make emergency plan changes without prior Commission approval only if the changes do not decrease the effectiveness of the plan and the plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to Part 50.

Contrary to the above, on April 3, 1997, the licensee made a change to its emergency plan, without prior NRC approval, that decreased the effectiveness of the plan. Specifically, the change reduced the level of health physics expertise on-shift and overburdened the on-shift chemistry technician with health physics responsibilities.

This is a Severity Level IV violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.



If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Walnut Creek, California  
this 2nd day of July 1998