

APPENDIX A
NOTICE OF VIOLATION

Washington Public Power Supply System
Post Office Box 968
Richland, WA 99352

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

During an NRC inspection conducted on April 17 - June 3, 1989, violations of NRC requirements were identified. In accordance with the 10 CFR Part 2, Appendix C, "General Statement of Policy and Procedure for NRC Enforcement Actions," 53 Fed. Reg. 40019 (October 13, 1988), the violations are listed below:

- A. 10 CFR 20.203(b) states in part: "Each radiation area shall be conspicuously posted"

Technical Specification 6.8.1 states, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

"k. Health Physics/Chemistry Support Program."

Health Physics/Chemistry Support Programs procedure PPM 1.11.11, "Entry Into, Conduct In, and Exit From Radiologically Controlled Areas," states in section 1.11.11.3.A that "All work performed in a radiologically controlled area shall be performed using a Radiation Work Permit (RWP)." Section 1.11.11.3.B states that "Health Physics personnel shall post all radiologically controlled areas in accordance with PPM 11.2.7.1, 'Area Posting'".

Health Physics procedure 11.2.7.1, "Area Posting," section 11.2.7.1.5.A.3, states in part, "Barrier the perimeter of the radiation area at approximately waist height (normally)."

Contrary to the above, on May 16, a barrier was not installed across the entry to the reactor water cleanup (RWCU) heat exchanger room, which was a radiation area, and a worker who was not authorized by an RWP to be in the radiation area was allowed free access into this area.

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

- B. 10 CFR 50.72(b)(2) states in part: "...the licensee shall notify the NRC as soon as practical and in all cases, within four hours of ...
(i) Any event, found while the reactor is shut down, that, had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principal safety barriers, being seriously degraded"

Contrary to the above, during testing of the high pressure core spray (HPCS) system conducted on May 12, 1989 during the annual refueling outage, a failed socket weld on a high point vent caused a non isolable



leak to exist between the wetwell of the primary containment and the reactor building. This loss of primary containment integrity was discovered at 3:15 a.m. and was not reported until 12:05 p.m.

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

- C. 10 CFR 50.73(a) states in part: "(1) The holder of an operating license... shall submit a Licensee Event Report (LER) ... within 30 days after the discovery of the event (2) The licensee shall report: ... (v) Any event or condition that alone could have prevented the fulfillment of the safety function of ... systems that are needed to ... (A) Shut down the reactor and maintain it in a safe condition; ... or (D) Mitigate the consequences of an accident."

Contrary to the above, the licensee failed to report within 30 days, and had not reported as of June 12, 1989 an event that occurred on February 10, 1989, in which inoperability of the suction valve from the suppression pool to the high pressure core spray (HPCS) system could have prevented the HPCS system from performing its safety function.

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

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspection office at Washington Nuclear Project 2. 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 if admitted, (2) the corrective steps that have been taken and the results achieved; (3) corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending your response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION



R. P. Zimmerman, Acting Director
Division of Reactor Safety
and Projects

Dated at Walnut Creek, California
this 28 day of June 1989

