

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 May 13 - June 23, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

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

"a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Appendix A of Regulatory Guide 1.33, Section 1.c, lists a procedure for "Equipment Control (e.g. locking and tagging)."

PPM 1.3.8C, Danger Tag Clearance Order (Manual), Revision 0, Section 4.2.18, states, "Independent Verification is required when the component is SAFETY RELATED (QC 1)...". PPM 1.3.8A, Caution Tag Order, Revision 0, Section 6.B.2.c.(6), states in part, "If work is associated with Safety-Related... Systems, an independent verification of component position is required by a second qualified individual."

Contrary to the above, on May 24, 1991 the following clearance orders on safety related systems had not received independent (second) verification:

<u>Clearance Order No.</u>	<u>System</u>
91-6-C005 (Caution)	Containment Atmospheric Control
91-5-C094 (Caution)	Reactor Core Isolation Cooling
91-5-C004 (Caution)	Inverter No. 3
90-9-C021 (Caution)	High Pressure Core Spray
90-12-C084 (Danger)	Leak Detection System

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

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



"g. Fire Protection Program implementation."

PPM 1.3.10, Revision 11, Fire Protection Program, states in part:

"10.0 FIRE PROTECTION SYSTEM IMPAIRMENT CHECKLIST

"10.1 Required when:

"10.1.6 Leaving a normal closed fire door or damper in open position."

Contrary to the above, on May 13, 1991, normally closed fire door R402 at the northeast corner of the 522' level of the reactor building was propped in the open position and a Fire Protection System Impairment Checklist had not been provided.

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 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 Inspector, 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, (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. 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. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 18th day of July, 1991

