

NOTICE OF VIOLATION

Washington Public Power Supply System  
Washington Nuclear Project No. 2

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

During an NRC inspection conducted on February 1 through 11, 1993, 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, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, states, in part: "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above:

- 1) As of February 11, 1993, the cause of valve hammering, a significant condition adverse to quality, identified in May, 1991 on service water loop isolation valves SW-V-12A and SW-V-12B, had not been determined nor had corrective action been taken to preclude recurrence.
- 2) As of February 11, 1993, corrective action for a deviation from plant chemistry requirements, a condition adverse to quality identified in September 1992, had not been taken. In particular, the service water system sulfur concentration exceeded control limits established in Administrative Procedure 1.13.1, "Chemical Process Management and Control," Revision 11. The sulfur limit of 150 ppm was exceeded in September 1992, reached values as high as 183 ppm, and had not been brought back into specification at the conclusion of the inspection on February 11, 1993.

This is a severity level IV violation (Supplement I).

B. 10 CFR 50, Appendix B, Criterion V states, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

WNP-2 Plant Procedure, PPM 1.2.3, "Use of Controlled Procedures" Revision 19, states in paragraph 5.1.2 that plant personnel are responsible for operating plant equipment and systems per applicable plant procedures.

WNP-2 Plant Procedure, PPM 2.4.5, "Standby Service Water System" Revision 19 requires valves SW-V-168B and SW-V-169B to be positioned and verified closed and that the personnel performing the positioning and performing the independent position verification initial for their actions on a data sheet.

WNP-2 Plant Procedure, PPM 3.1.1, "Master Startup Checklist," Revision 12 Attachment 7.1, requires that the Shift Manager review and resolve situations where valves cannot be positioned as required by the checklist. It additionally requires that checklist discrepancies be addressed by submitting a procedure revision request.

Contrary to the above, quality affecting activities were not accomplished in accordance with procedures in that:

1) On June 17, 1992, an equipment operator erroneously verified, by initialling, that valves SW-V-168B and SW-V-169B were shut. However, the valves were inaccessible under water at the time of the valve line up and could not be verified shut.

2) On June 17, 1992, another equipment operator independently verifying valve position erroneously annotated the valve line up sheet with a note that stated "Valves removed and line is capped". However, the valves were not removed, nor was the line capped at that time.

3) On June 17, 1992, the Shift Manager did not resolve the situation where valves SW-V-168B and SW-V-169B could not be positioned as required by the checklist. Further, the Shift Manager did not submit a procedure revision request for the checklist discrepancy which stated "Valve removed, line capped...."

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, D.C. 20555 with a copy to the Regional Administrator, Region V, 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, (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 or a Demand for Information 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 27<sup>th</sup> day of APRIL 1993