

NOTICE OF VIOLATION

Washington Public Power Supply System
Washington Nuclear Plant No. 2

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

During an NRC inspection conducted from May 24 through May 28, 1993, two examples of a violation 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 violation is identified below:

- A. Technical Specification 6.8.1 states that: "Written procedures shall be established, implemented and maintained covering...applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978...." Appendix A of Regulatory Guide 1.33 specifies procedures for procedure adherence, and refueling operations.

Plant Procedure Manual (PPM) procedure number 1.3.18, Revision 8, "Foreign Material Control Around the Spent Fuel Pool, the Reactor Cavity and the Dryer-Separator Pit," provides the requirements for control of foreign material in exclusion areas.

- (1) PPM 1.3.18 section 6.2.1.d requires that an item be moved out of the foreign material control boundary prior to any required disassembly when possible.
- (2) PPM 1.3.18 section 3.8 requires that tools used inside the foreign material exclusion boundary be marked, using vibro etching or other suitable permanent markings, with a number and that this number be used to maintain the inventory of the tools and to aid in providing positive identification in logging the tools into the Foreign Material Control Accountability Log.

Contrary to the above, on or about May 26, 1993, NRC inspectors observed the following:

- (1) An underwater camera was disassembled inside a posted Foreign Material Control Boundary, and associated loose parts (cap screws and a cover plate) were not controlled or attended. Disassembly of the camera outside the foreign material exclusion boundary was possible.
- (2) A review of the Refueling Floor Foreign Material Control Accountability Log sheets for May 25 through 27, 1993, noted six tools logged without a unique number for positive identification of the tools.

This is a Severity Level IV violation (Supplement I). This is a repeat of a violation issued on June 30, 1992.

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.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Walnut Creek, California
this 25th day of June, 1993