

APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System  
Washington Nuclear Project 2

Docket: 50-397  
License: NPF-21

During an NRC inspection conducted on April 2 through May 14, 1994, 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. Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:

c. Refueling operations."

WNP-2 Plant Procedures Manual (PPM) 2.14.1, Revision 9, "Refueling Bridge Operation," paragraph 5.2, Step 11, states "CAUTION: Raising the mast into the uptravel stop at high speed may cause overshoot which could cause the top of active fuel to be less than 7' 6" below the water level. DO NOT let (the) mast come above -0.75" on the HOIST position readout."

Contrary to the above, on May 11, 1994, during Step 689 of the refueling sequence (for Irradiated Bundle AN3030), the refueling mast operator raised the mast up to -0.87 inches on the hoist position readout.

This is a Severity Level IV violation. (Supplement I) (50-397/9414-03)

- B. 10 CFR Part 50, Appendix B, Criterion XVI states, in part, "Measures shall be established to ensure 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 the cause of the condition is determined and corrective action taken to preclude repetition."

In August 1993, to preclude erratic operation of RRC-V-60A and reactor power fluctuations, the licensee revised PPM 2.1.1, "Reactor Recirculation System," to require RRC-V-60A to be locked in place when operating at reduced flows, but did not specify the timeliness for hydraulically locking the valve.

Contrary to the above, corrective actions taken were not adequate to preclude repetition of erratic operation of RRC-V-60A and reactor power fluctuations. On April 26, 1994, RRC-V-60A was not locked during reduced flow operations and operated erratically, causing power fluctuations which resulted in a manual reactor scram.

This is a Severity Level IV violation. (Supplement I) (50-397/9414-01)

- C. 10 CFR Part 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 PPM 1.3.19, "Plant Material Condition Inspection Program," Revision 15, paragraph 4.1.5(a)(8) states, "When using gas bottles, whether flammable or nonflammable, they must be properly secured against a substantial structural member with heavy rope or, preferable, chain or cable, in such a manner as to preclude them from falling over. Bottles are to be tied off both at top and at bottom (to preclude 'kick out' and falling to the floor)."

Contrary to the above, on April 21, 1994, two compressed gas cylinders were found unattended and unrestrained near safety-related equipment on the 522 foot elevation of the reactor building.

This is a Severity Level IV violation. (Supplement I) (50-397/9414-02)

Pursuant to the provisions of 10 CFR 2.201, the 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 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, (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 Arlington, Texas,  
this *23rd* day of *June* 1994