

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 May 15 through June 25, 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. 10 CFR 20.1502(a)(3) requires licensees to monitor individuals for exposure to radiation if the individual enters a high radiation area.

Contrary to the above, on May 23, 1994, an individual entered a high radiation area and worked for approximately 15 minutes without being monitored for exposure to radiation.

This is a Severity Level IV violation (Supplement IV) (50-397/9419-04).

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

c. Refueling operations."

1. WNP-2 Plant Procedures Manual (PPM) 6.3.2, Revision 8, "Fuel Shuffling and/or Offloading and Reloading," paragraph 6.1.3, states to "Verify the identity of each fuel assembly by orientation and location on the Nuclear Components Transfer List (NCTL) when it is loaded. The Refueling Supervisor or designee shall initial the appropriate line of the NCTL as each step is completed. Verification of each step will be documented by the verifier's/designee's initials."

Contrary to the above, on June 10, 1994, during Step 1338 of the refueling sequence, Bundle UD4098 was placed in the core 90 degrees from the orientation prescribed in the NCTL. The refueling senior reactor operator and the bridge operator each initialed that they verified that the bundle was placed in the core properly (397/9419-05).

2. WNP-2 PPM 10.3.6, Revision 9, "Reactor Vessel Steam Dryer and Moisture Separator Removal and Replacement," paragraphs 6.2.3 and 6.24, states to "Remove the wrench and ensure the locator tab at the top of the bolt is parallel to a vessel radius," and "Obtain second person verification of 36 shroud head bolts are aligned for moisture separator removal . . ." respectively.

Contrary to the above, on June 25, 1994, PPM 10.3.6 was not properly implemented during the removal of the reactor moisture separator,



when two individuals initialled that the shroud head bolts were aligned for moisture separator removal even though one of the bolts was not properly aligned for removal (397/9419-02).

3. WNP-2 PPM 10.4.12, Revision 3, "Crane and Hoist Program Control," paragraph 7.4.2.e, states that "The written instruction should contain each piece of equipment and accessory to be used by type, rated capacity. Rigging sketches, load paths, limitations and individual sign off steps should be included in the applicable written instruction."

Contrary to the above, on June 25, 1994, the written instruction for removing the reactor moisture separator, WNP-2 PPM, 10.3.6, "Reactor Vessel Steam Dryer and Moisture Separator Removal and Replacement," Revision 9, did contain each piece of equipment and accessory to be used by type, rated capacity, and limitations (397/9419-03).

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

- C. 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."

Contrary to the above, on June 23, 1994, after the cord of an underwater inspection light had been severed and the light dropped into the reactor vessel, the licensee did not take adequate measures to assure that the cause of the condition was determined nor provide corrective action to preclude repetition. As a result of this failure, a second underwater inspection light cord was severed and the light dropped into the reactor vessel about 67 minutes later.

This is a Severity Level IV violation (Supplement I) (397/9419-01).

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, and a copy to the NRC Resident Inspector for 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, (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, the Commission may issue an order or a demand



for information as to 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 *29th* day of July 1994

