

ENCLOSURE 1

NOTICE OF VIOLATION

Washington Public Power Supply System  
Washington Nuclear Project-2

Docket: 50-397  
License: NPF-21

During an NRC inspection conducted on February 13 through March 14, 1995, three 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 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."

1. Procedure EI 2.8, "Generating Facility Design Change Process," Revision 11, Section 4.1.8.a, states that "[drawing change notices] DCNs shall be prepared in accordance with Attachment 5.10 and shall be listed on the document control system input sheet."

Contrary to the above, as of March 3, 1995, a drawing change notice was not prepared, or included on a document control system input sheet, for the Final Safety Analysis Report Drawing 02E12-04.10.1: Sheets 1 and 2, and the drawing was not updated.

2. Procedure PDS-5, "Design Safety Analysis and 10 CFR 50.59 Review Guidance," Revision 2, Attachment 7.1, requires a safety evaluation for modifications which affected the fire hazards analysis.

Contrary to the above, on February 20, 1991, and January 23, 1992, a safety evaluation addressing potential fires and their effects, was not performed for the addition of a filter/polisher unit in the diesel fuel oil system. This modification affected the fire hazards analysis.

This is a Severity Level IV violation (Supplement I) (397/9503-01).

B. Criterion III of Appendix B to 10 CFR Part 50 states that measures shall be established to assure that the design basis are correctly translated in procedures and instructions.



Contrary to the above, as of March 3, 1995, established measures did not assure that:

1. The design basis of the standby service water system was correctly translated into procedures and instructions in that the acceptance criteria of Procedures 7.4.7.1.1.1 and 7.4.7.1.1.2 did not account for variations in spray pond level or pump degradation.
2. The design basis of the diesel fuel oil system was correctly translated into procedures and instructions in that the acceptance criteria of the surveillance test procedures did not account for variations in suction conditions or pump degradation.
3. The design basis of the spent fuel pool cooling system was correctly translated into procedures and instructions in that the acceptance criteria of the surveillance test procedures did not account for variations in suction pressure or pump degradation.

This is a Severity Level IV violation (Supplement I) (397/9503-02).

- C. Criterion V of Appendix B to 10 CFR Part 50 states, in part, that "[a]ctivities affecting quality shall be prescribed by documented instructions . . . of a type appropriate to the circumstances . . . ."

Contrary to the above, as of March 3, 1995, Procedure 10.2.8, Testing and Repair of Safety and Relief Valves, Revision 15, was not appropriate to the circumstances in that:

1. Section 4.0 did not contain any precaution related to the determination of adjustment ring position prior to disassembly;
2. Section 6.2 did not require an authorized nuclear inspector review for testing and resetting of relief valves;
3. Section 6.1.3.j did not provide any instructions on which direction to turn the rings, nor did it identify a reference point for counting turns and notches;
4. Section 6.1.8.d stated that the adjusting rings should be installed to the same position as when removed or to the manufacturer's specifications; however, in the same section, it was stated that the ring positions were for information only; and,
5. Section 6.2.5.b stated that adjustment rings for liquid service valves had little or no influence over the valve reseal characteristics.

This is a Severity Level IV violation (Supplement I) (397/9503-06).

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 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued 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 16th day of June 1995