

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 July 16 through September 2, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381, June 30, 1995), the violation is 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."

Plant Procedures Manual (PPM) 7.4.3.3.1.53, "HPCS Initiation Drywell Pressure High A & C - CFT/CC," required a second person to verify that MS-PS-47A and C were properly valved into service.

The I&C Shop Practices Manual (SPM), revision 4, required the second person verification to be a "hands-on" verification unless the implementing procedure was revised, for as low as reasonably achievable (ALARA) considerations, to allow the second person verification to be performed using an alternative method.

Contrary to the above, on July 26, the inspector identified during performance of PPM 7.4.3.3.1.53 that the second person verification check was performed by watching the primary worker perform the valve manipulations rather than "hands-on" and no provisions were made in the procedure for this alternate means of checking valve positions.

This is a Severity Level IV violation (Supplement I) (397/9526-02).

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 previously 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.

Because the response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if it is necessary to include such information, it should clearly indicate the specific information that should not be placed in the PDR, and provide the legal basis to support the request for withholding the information from the public.

Dated at Arlington, Texas,  
this *25th* day of *October* 1995