

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 January 7 through February 17, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances.
- Contrary to the above, as of January 17, 1996, Plant Procedures Manual Procedure 2.10.4, "Diesel Generator (DG) and Cable Cooling Heating, Ventilation, and Air Conditioning (HVAC)," Revision 12, dated January 11, 1996, was not appropriate to the circumstances because procedural steps (intended to troubleshoot for low DG room temperatures) did not include provisions for checking other possible causes, such as the standby DG heating and ventilation unit dampers.

This is a Severity Level IV violation (Supplement I) (397/9602-01).

- B. 10 CFR 50.59, in part, permits the licensee to make a change to the facility, as described in the safety analysis report, without prior Commission approval provided the change does not involve an unreviewed safety question. If such a change is made, the licensee is required to maintain records of the change and the records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

FSAR, Section 9.4.7.1, stated that electric heaters are designed to maintain DG rooms at a minimum temperature of 70°F during extreme weather conditions. This provides a 7°F margin above the minimum temperature of 63°F, which is required to assure DG operability. The heaters were located within DG room heating, cooling and ventilation units and were powered from a Class 1E power source.

FSAR, Section 11.3, and Table 11.3-2 describe gas coolers that are utilized in the off-gas (OG) system to cool effluents to within the design requirements of the charcoal absorbers (-40°F to +40°F).

Contrary to the above, the licensee failed in two instances to perform a written safety evaluation, which provided the bases for the determination that a change to the facility as described in the safety analysis report, was not an unreviewed safety issue.

- As of January 30, 1996, the licensee has accepted the condition that the DG room heaters could not meet the FSAR statement of

maintaining the DG rooms at a minimum temperature of 70°F during extreme weather conditions. This is considered to be a de facto change to the facility, as described in the safety analysis report, and no safety evaluation was performed to determine that an unreviewed safety question did not exist.

This is a Severity Level IV violation (Supplement I) (397/9602-02).

- As of February 3, 1996, the licensee accepted the long term inoperable condition of all of the OG gas coolers. This was a de facto change to the facility as described in the safety analysis report and no safety evaluation existed which demonstrated that an unreviewed safety question did not exist.

This is a Severity Level IV violation (Supplement I) (397/9602-02).

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 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.

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 19th day of March 1996

