

Enclosure

NOTICE OF VIOLATION

Washington Public Power Supply System
Washington Nuclear Project-2

Docket No.: 50-397
License No.: NPF-21

EA 96-343

During an NRC inspection conducted on July 31 through August 9, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

A. Violation associated with the estimated critical position (ECP) event:

WNP-2 Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, lists activities that should be covered by written procedures, including, "Administrative procedures for log entries and record retention, General Plant Operating Procedures, and Startup."

Procedure PPM 1.3.1 "Conduct of Operations," Revision 26, step 4.6.2 (r) states, "Shift turnover of the control room staff is inappropriate when criticality is imminent."

Procedure PPM 1.3.1 "Conduct of Operations," Revision 26, step 4.6.2b states, "The Reactor Operator at H13-P603 shall not be distracted by control room activities such as shift turnover, shift brief, or surveillances."

Contrary to the above, the inspectors identified that:

1. On July 27, 1996, shift turnover was conducted during the approach to criticality.
2. On July 27, 1996, the shift manager conducted the shift brief while the CRS returned to the at-the-controls area to oversee control rod withdrawals at the approach-to-criticality.

This is a Severity Level IV violation (Supplement I)(50-397/9616-03).

B. Violation associated with the Adjustable Speed Drive (ASD) event:

Criterion V of 10 CFR 50, Appendix B, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances . . . These instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

WNP-2 Technical Specification 6.8.1.a states in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, recommends procedures covering the reactor recirculation system.

Contrary to the above, Procedure PPM 8.3.339, "Test Instructions - Reactor Recirculation (RRC) Adjustable Speed Drive (ASD) and Reactor Digital Feedwater (DFW) Control Power Ascension Test Program," Revision 1, was inadequate. The procedure did not contain sufficient instructions to preclude the manipulation of facility controls as expressly prohibited by 10 CFR 50.54(i), in that, the reactor recirculation control system was operated by a nonlicensed individual on July 20, 1996.

This is a Severity Level IV violation (Supplement I) (50-397/9616-05).

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. The Supply System is not required to resubmit any information for which the NRC has already formally received. 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.

Because your 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 you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 7th day of November 1996