

ENCLOSURE 1

NOTICE OF VIOLATION

Washington Public Power Supply System
Washington Nuclear Project-2

Docket No.: 50-397
License No.: NPF-21
EA No.: 97-354

During an NRC inspection conducted during the period May 11 through July 30, 1997, 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. 10 CFR Part 50, Appendix B, Criterion III (Design Control) states, in part, that "[m]easures shall be established to assure that applicable regulatory requirements and the design basis . . . are correctly translated into specifications, drawings, procedures, and instructions."

Contrary to the above, as of May 2, 1995, measures did not assure that the applicable regulatory requirements and the design basis, for the power-up rate modification, were correctly translated into specifications, drawings, procedures, and instructions. Specifically, the power-up rate modification (Technical Specification Amendment 137) became effective on May 2, 1995, with the recirculation system cavitation interlock setpoint established at 9.9°F even though the recirculation system design basis, as indicated in General Electric Letter 94-PU-0013, dated March 18, 1994, specified, in part, that the 10.7°F recirculation system differential temperature cavitation setpoint was consistent with the analysis in support of the power-up rate project. No additional analysis was performed to support the change in the power-up rate recirculation system design basis.

This is a Severity Level IV violation (Supplement I)(50-397/9710-01).

- 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.

Final Safety Analysis Report, Appendix H.2.3.3.2.2, "Feedwater Pump Trip Runback," Amendment 35, states that, when the recirculation pump is running on the 100 percent power supply, the flow control valves close in response to a trip of one feedwater pump and indication of a reactor water level decrease (level drops to Level 4). This runback prevents a scram from a low level condition caused by the feedwater pump trip.

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Contrary to the above, as of March 27, 1997, the written safety evaluations performed to support the installation of the adjustable speed drives (Safety Evaluation Control 93-200, dated July 11, 1995) and deferral of power ascension testing (Safety Evaluation Control 96-106, dated December 12, 1996) were not adequate to provide the basis that an unreviewed safety question did not exist. Specifically, the licensing basis impact determination for Plant Modification Request 87-0244 did not provide a sufficient basis to determine that the change did not involve an unreviewed safety question for the design and testing of the reactor recirculation system adjustable speed drive. The licensing basis impact determination did not identify that the reactor recirculation system cavitation interlock would actuate during a loss of a reactor feedwater pump. This resulted in a second recirculation pump runback and reactor operation near the power-to-flow instability Region A, an area of operation prohibited by Technical Specifications. This plant response was not recognized and reviewed.

This is a Severity Level IV violation (Supplement I)(50-397/9710-02).

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 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 2nd day of September 1997

