

ENCLOSURE 1

NOTICE OF VIOLATION

Washington Public Power Supply System  
Washington Nuclear Project-2

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

During an NRC inspection conducted on August 17 through September 27, 1997, four 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. Technical Specification (TS) Surveillance Requirement (SR) 3.4.5.1, states, in part, "Verify reactor coolant system unidentified and total leakage . . . [every] 12 hours." Total leakage is the summation of unidentified leakage and identified leakage.

TS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met."

Contrary to the above, on September 5, 1997, TS SR 3.4.5.1 a valid surveillance was not completed within 1.25 times the interval specified in the TS Frequency. The surveillance was completed at 3:30 p.m. on September 5, approximately 20 hours following the previous acceptable surveillance (7 p.m. on September 4, 1997). The surveillance was required to be performed no later than 10 a.m. on September 5, 15 hours (12 hours times 1.25) after the previous surveillance.

This is a Severity Level IV violation (Supplement I).

- B. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, and deviations, are promptly identified and corrected.

Contrary to the above, from July 16-18, 1997, the licensee failed to take prompt corrective actions for a condition adverse to quality. Specifically, on July 16, 1997, a system engineer identified a broken lockwire on a pressure control valve associated with the safety-related nitrogen supply to Subsystem B of the automatic depressurization system. However, the licensee failed to verify the setpoint of the valve until two days later. The setpoint was determined to be below that to support long term operation of the Subsystem B automatic depressurization system valves.

This is a Severity Level IV violation (Supplement I).

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- C. 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that "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 1.3.12, Revision 24, dated January 6, 1997, requires, in part, Problem Evaluation Requests (PERs) to be written for the following conditions:

- "Conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances."
- "Structures, systems or component malfunction, damage, or degradation considered sudden or unexpected, or outside the anticipated performance of the item. This situation needs further analysis other than only initiating a work request to remedy the condition . . ."

Contrary to the above, as of August 17, 1997, the licensee failed to follow procedures for documentation in a PER of a degraded and failed condition. Specifically,

1. Between July 10 and August 10, 1997, Hydraulic Control Unit HCU-4619 experienced six low accumulator pressure alarms, indicating that the accumulator was in a degraded condition outside of its anticipated performance. However, no PER was written until the unit failed on August 11, 1997.
2. On July 21, 1997, the safety-related containment hydrogen monitor (CMS-SR-14) failed and was declared inoperable, but no PER was initiated.

This is a Severity Level IV violation (Supplement I).

- D. 10 CFR 20.1501 requires that each licensee make or cause to be made surveys that may be necessary for the licensee to comply with the regulations in Part 20 and that are reasonable under the circumstances to evaluate the extent of radiation levels, concentrations or quantities of radioactive material, and the potential radiological hazards that could be present.

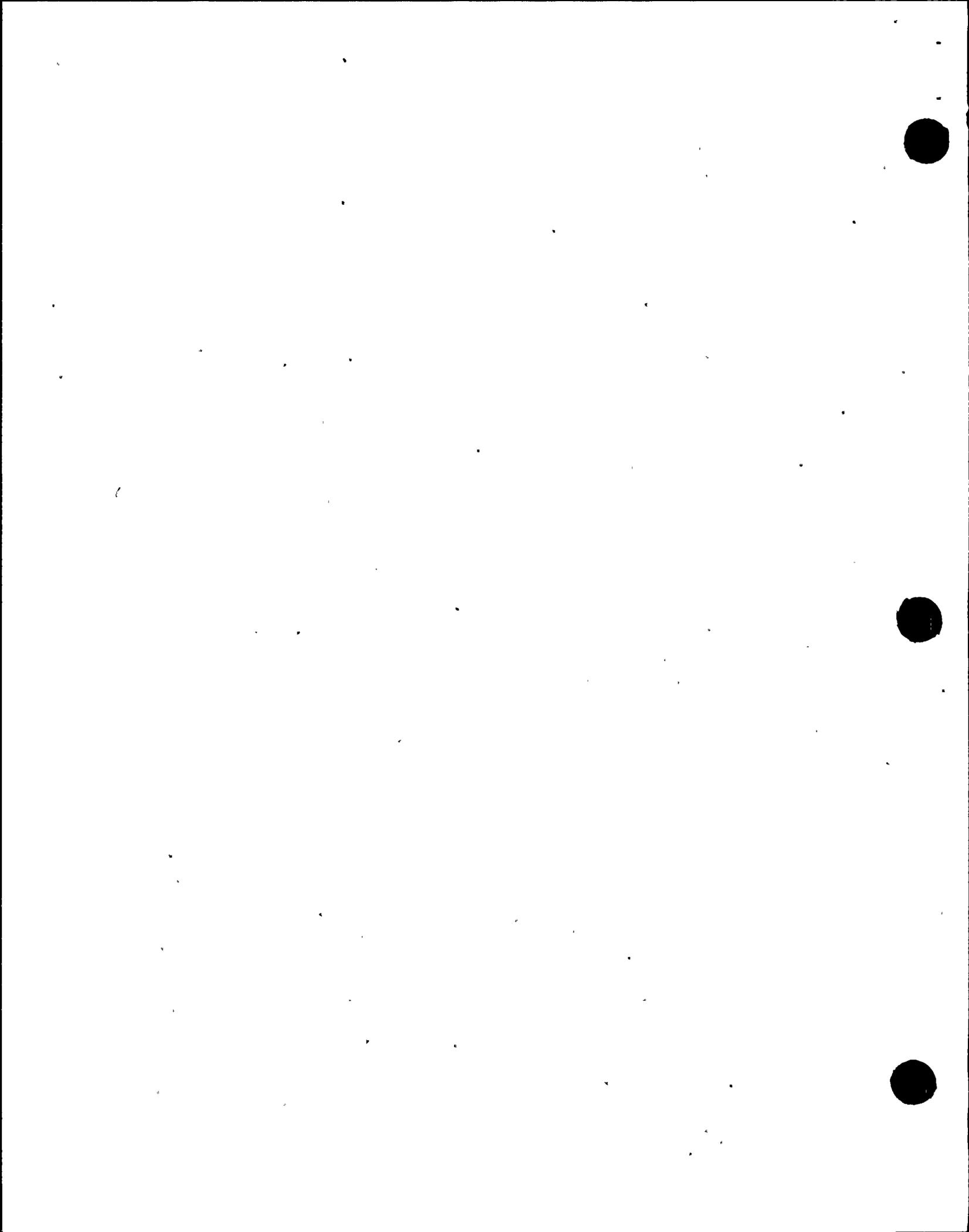
Pursuant to 10 CFR 20.1003, *survey* means an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation.

Contrary to the above, between July 29 and September 11, 1997, the licensee failed to make surveys necessary for compliance with 10 CFR 20.1902 and 20.1201. Specifically,

1. On July 29, 1997, the licensee did not make surveys to assure compliance with 10 CFR 20.1902, which requires posting of areas accessible to individuals in which radiation levels could result in an individual receiving a dose equivalent in excess of 0.1 rem in 1 hour at 30 cm from the radiation source or from any surface that the radiation penetrates, as high radiation areas. Specifically, two individuals entered an area around a condensate filter/demineralizer that was posted as a radiation area. However, changes in plant conditions had resulted in radiation levels 30 cm from the filter/demineralizer greater than 0.1 rem/hr.
2. On September 4, 1997, the licensee did not make surveys to assure compliance with 10 CFR 20.1201, which limits occupational dose to adults, including dose to the skin and committed dose equivalent. Specifically, an equipment operator entered a contamination area and breached a known contaminated system without surveys being made to assess the radiological hazards of the evolution. As a result, the individual received a small uptake of Cobalt-60 and skin contamination.
3. On September 11, 1997, the licensee did not make surveys to assure compliance with 10 CFR 20.1201, which limits occupational dose to adults, including dose to the skin. Specifically, four individuals performed work on a potentially contaminated pump-motor coupling without surveys being made to verify the radiological conditions of the work area. As a result, all four individuals received low levels of skin contamination.

This is a Severity Level IV violation (Supplement IV).

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 21st day of October 1997

