

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 October 11 through November 21, 1998, three 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 5.4.1.a requires that written procedures shall be established, implemented, and maintained covering, in part, equipment control.

Procedure 1.3.1, "WNP-2 Operating Policies, Programs and Practices," Revision 38, Step 4.1.5 states: "During the performance of a procedure or PM [preventive maintenance] that causes the system or component to become inoperable per Technical Specifications/Licensee Controlled Specifications, the control room supervisor/shift manager shall declare the associated system or component inoperable and enter it on the . . . Surveillance Information Log (Surveillance Log)" In addition, Step 4.1.2 states: "All verification or operations required by the WNP-2 Technical Specifications/Licensee Controlled Specifications should be entered in the Reactor Operator's Log upon their completion."

Contrary to the above, between November 4 and 5, 1998, during Technical Specification required testing of the standby liquid control system that rendered portions or all of the system inoperable, the control room supervisor/shift manager failed to enter the inoperable system or component(s) on the Surveillance Information Log and operators failed to log when operations related to the testing were completed, as required by Procedure 1.3.1.

This is a Severity Level IV violation (Supplement I) (50-397/98022-01).

- B. Technical Specification 5.4.1.a requires that written procedures shall be established, implemented, and maintained covering, in part, equipment control.

Procedure MSP-SGT-B104, "Standby Gas Treatment Filtration System - Unit B Charcoal Absorber Test," Revision 2, Section 7.7, provides instructions for performing a charcoal adsorber test.

Contrary to the above, on October 7, 1998, testing required to demonstrate that the standby gas treatment system will perform satisfactorily in service was not performed in accordance with the written test procedure. Specifically, (1) craft personnel failed to perform Procedure MSP-SGT-B104, Steps 7.7.1 through 7.7.4. in sequence, as required by Step 4.1 and (2) craft personnel did not install the upstream sample probe for detecting the challenge gas in accordance with Step 7.7.1.

This is a Severity Level IV violation (Supplement I) (50-397/98022-02).

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- C. Technical Specification 5.4.1.e requires, in part, that written procedures shall be established, implemented, and maintained covering the Ventilation Filter Testing Program.

Technical Specification 5.5.7, "Ventilation Filter Testing Program," paragraph b, requires after specific activities and on a specified periodicity an in-place test to demonstrate that the charcoal adsorber shows penetration and less than 0.05 percent system bypass.

Procedure MSP-SGT-B104, implements, in part, the requirements of Technical Specification 5.5.7.b.

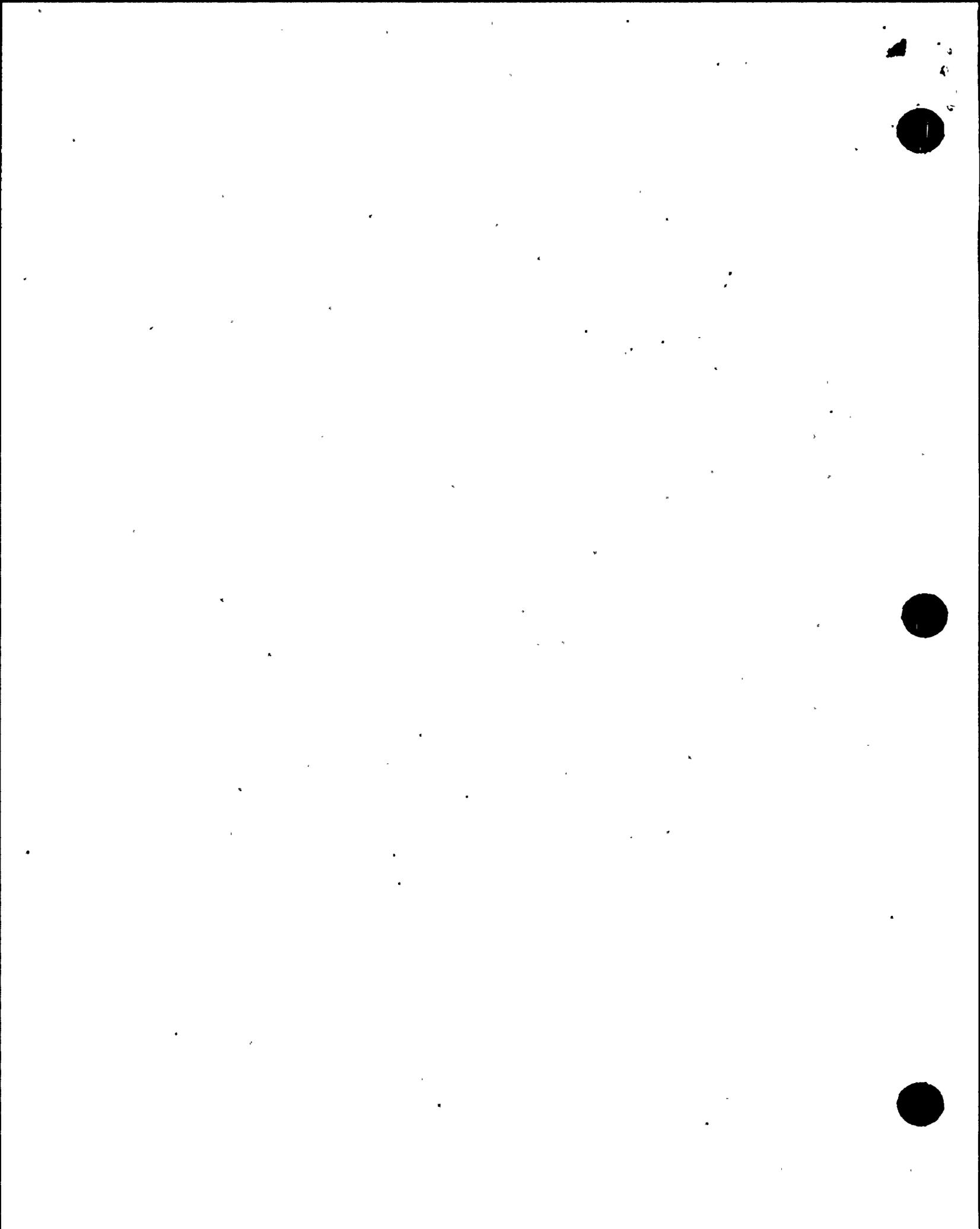
Contrary to the above, on October 7, 1998, Procedure MSP-SGT-B104 was inadequate to demonstrate that the charcoal adsorber shows a penetration and less than 0.05 percent system bypass. Specifically, guidance provided for injection of the challenge gas did not assure its uniform distribution to challenge all portions of the adsorber bed to verify compliance with Technical Specifications.

This is a Severity Level IV violation (Supplement I) (50-397/98022-03).

The NRC has concluded that information regarding the reasons for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance will be achieved is already adequately addressed on the docket in the enclosed inspection report. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it 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).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response, if you choose to provide one, 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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for



withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas
this 21st day of December 1998