

UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

January 29, 1999

EA 98-480

Mr. J. V. Parrish (Mail Drop 1023)
Chief Executive Officer
Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352-0968

SUBJECT: NOTICE OF VIOLATION
(NRC AUGMENTED INSPECTION REPORT 50-397/98-16 and NRC AIT
FOLLOWUP INSPECTION REPORT 50-397/98-20)

Dear Mr. Parrish:

The NRC conducted an augmented inspection on June 19 through July 8, 1998, and a followup inspection on August 24 through September 17, 1998, at your Washington Nuclear Project-2 facility. The purpose of these inspections was to address the fire protection system rupture and internal flooding event which occurred on June 17, 1998. The augmented inspection report (50-397/98-16) was issued on July 16, 1998, and the followup inspection report (50-397/98-20) on October 16, 1998. The circumstances surrounding the event were discussed with you and your staff at various management meetings, public meetings, and phone conferences since the time of the event. NRC letter dated October 16, 1998, described an apparent violation (EA-98-480) of 10 CFR Part 50, Appendix A, General Design Criterion 3, "Fire Protection." The NRC informed you that it was considering escalated enforcement action for this apparent violation. You elected to respond to the apparent violation in writing in lieu of requesting a predecisional enforcement conference.

Based on the results of the inspections, management meetings, public meetings, and the information that you provided in your response letter to the apparent violation, dated December 18, 1998, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation and the circumstances surrounding it are described in detail in the subject inspection reports. The violation involves your failure to assure that a rupture of the plant's fire main would not impair equipment important to safety. Specifically, on June 17, 1998, the actuation of the fire protection system induced a water hammer which caused the rupture of a fire main valve in the northeast stairwell of the reactor building. The resulting water from the running fire protection pumps entered a residual heat removal pump room through an open watertight door. The water then spread to the adjacent low pressure core spray pump room via a sump isolation valve that failed to close. The water completely submerged the residual heat removal pump and motor and the Division I keepfill pump. The water rose to just below the motor in the low pressure core spray pump room and completely submerged the Division II keepfill pump.

As described in NRC Inspection Report 50-397/98-16, the flooding event did not pose a risk to the public health and safety and the actual safety consequences were low. However, the potential safety consequences were considered to be more significant. Had the fire protection

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system actuation been the result of an actual, developed fire, and had it occurred while the plant was operating at power, operators would have been faced with combating two separate events (fire and flooding), while tasked with a plant shutdown in accordance with emergency operating procedures. The event could have been further complicated had it occurred outside normal working hours when personnel resources to combat the event would have been minimal. Therefore, the violation has been categorized in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600 at Severity Level III.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$55,000 is considered for a Severity Level III violation. Because your facility has been the subject of escalated enforcement actions within the last 2 years,¹ the NRC considered whether credit was warranted for *Identification* and for *Corrective Action* in accordance with the civil penalty assessment process in Section VI.B.2 of the Enforcement Policy. Because the violation was identified as the result of an event, the NRC considered whether identification credit was warranted based on the ease of discovery, whether the event occurred as the result of a self-monitoring effort, the degree of initiative in identifying the problem, and whether prior opportunities existed to identify the problem. The NRC concluded that while you were aware that the system was susceptible to water hammer transient during fire pump starts, the successful operation of the system during the past 14 years did not indicate that a catastrophic failure could occur. The NRC concluded that the detailed analysis of the root causes of the event and the initiative displayed in identifying the problem warranted identification credit.

The NRC then considered whether credit was warranted for corrective action. The NRC concluded that you are implementing thorough short-term and long-term corrective actions. Your interim corrective actions included strengthening the reactor building standpipe isolation valves and continuously running one of the main fire pumps to maintain fire protection system pressure. Your long-term corrective actions include design modifications to provide standpipe vacuum breaker valves and soft-start capability for the motor driven pumps, and resolving the NFPA noncompliances. As described in your letter, these long-term corrective actions are to be completed by June 30, 1999. Based on the corrective actions that you have taken and intend to take, the NRC concluded that credit was warranted for corrective actions.

Therefore, to encourage prompt and comprehensive correction of violations, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.

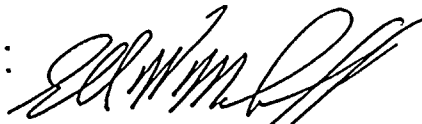
The NRC has concluded that the information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed on the docket in your December 18, 1998, letter. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

¹ The NRC issued a Severity Level III violation on June 1, 1998 (EA 97-573).

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,



Ellis W. Merschoff
Regional Administrator

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

Enclosure: Notice of Violation

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