

APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Docket No. 50-397
Construction Permit No. CPPR-93

As a result of the inspections conducted from July 26, 1982 to September 3, 1982, and in accordance with NRC Enforcement Policy, 10 CFR Part 2, Appendix C, 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V, as addressed in paragraph 17.1.1.2 of the FSAR (Quality Assurance Program) states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...(which)...include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." FSAR, Amendment 23, stated in section 8.3.1.4.3.7 "Where control devices of redundant systems are mounted in the same panel, physical separation (six inches), barriers, or isolation devices are provided."

Contrary to the above requirement, approved construction specifications used to install safety related Class 1E electrical cables since January 1979, have not specified acceptance criteria for separation of redundant Class 1E cables. For example, as a result of the absence of acceptance criteria in specifications for installation, on September 2, 1982 the Emergency Reactor Shutdown Panel H22-P100 contained cables 1P7AF-0004-C-Div-1, 1M7A-0094-C-Div-1, and other Class 1E Division 1 cables which were not provided six inch physical separation, barriers, or isolation devices from cables 2M8BA-0284-C-Div-2, 2COU2-0101-C-Div-2 and other redundant Division 2 Class 1E cables. "Connection Wiring Diagram Local Instrument Rack" (DWG E538, Rev. 8, sheet 40), and other construction guidance provided to and implemented by the installation contractor did not specify separation requirements of redundant safety related Class 1E circuits within this panel.

This is a Severity Level IV violation.

- B. 10 CFR 50, Appendix B, Criterion III, as addressed in FSAR section 17.1.1.3 Design Control (Burns and Roe) states in part: "Measures shall be established to assure that applicable regulatory requirements...are correctly translated into specifications, drawings, procedures, and instructions." Criterion VI, "Document Control," states in part: "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

The Burns and Roe "Quality Assurance Plan for Washington Public Power Supply System, Nuclear Project 2" (Second Edition, Rev. 0) states in Chapter III Sections 3.1 and 4.1:

"A project criteria document is prepared for the WNP-2 Project. This document, prepared by a criteria development team, identifies applicable regulatory requirements, design bases, codes, and standards to be translated into drawings, specifications, procedures, and instructions during the design process."

"The detailed design effort proceeds in accordance with the approved project criteria document and the applicable initial system description."

Contrary to the above, on September 1, 1982, the Design Engineer reviewing Design Drawings to insure implementation of electrical separation criteria in Design Documents and Engineering Directives, was working to criteria defined in an out-of-date and uncontrolled copy of FSAR Chapter 8.3 (Amendment 23) rather than the project criteria document. The uncontrolled copy differed in the description of separation criteria from that submitted to the NRC as FSAR, Chapter 8.3 (Amendment 23).

Additionally, the Burns and Roe Engineering Criteria Document, required by the Quality Assurance Plan, was found to be in conflict with FSAR Chapter 8.3 (Amendment 23) in that 'fire stops' were defined as 'isolation devices' in section D, paragraph 3.6.1.14 of the criteria document, although this was not reflected in FSAR (Amendment 23) Section 8.3.1.4.1.12 "Isolation Device."

The Project Criteria Document, section D, also included on page D-24z a Table IV titled "Divisional Compatability." The NRC took exception to this table in a letter from R. L. Tedesco to R. L. Ferguson, dated May 4, 1981 which instructed the licensee to "revise both Table IV... and your tray/cable marking codes to be consistent with your final cable separation criteria." Contrary to the commitments made by the Washington Public Power Supply System in the response letter of June 18, 1981 (G02-81-146) from G. D. Bouchey to R. L. Tedesco, Table IV denoted no separation requirements between any Class 1E system and any Non-Class 1E system.

This is a Severity Level IV violation.

Pursuant to the provisions of 10 CFR 2.201 you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including the corrective steps which will be taken to avoid further items of noncompliance, the corrective steps

which have been taken, the results achieved and the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

OCT 25 1982

ORIGINAL SIGNED BY
R. T. DODDS

Date

R. T. Dodds, Chief
Reactor Project Section 1