

APPENDIX A

NOTICE OF VIOLATION

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

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

As a result of the inspection conducted during May 1984, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2 Appendix C, 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50.72(b)(2)(iii)(C) and (D) requires that "the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of...any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to: ... (1) "Control the release of radioactive material" or (2) "Mitigate the consequences of an accident."

Contrary to the above, on April 11, 1984 the licensee failed to notify the NRC that both doors of the Primary Containment Personnel Airlock were simultaneously open for a moment thus defeating the airlock's intended function of controlling the release of radioactive material and mitigating the consequences of an accident if an accident were to occur.

This is a severity level IV violation (Supplement I).

- B. Technical Specifications section 6.8.1 requires that "Written procedures shall be established, implemented, and maintained covering the activities...referenced in Appendix A of Regulatory Guide 1.33 Revision 2." The FSAR Sections 13.5.11 and 17.2, and referenced Operational Quality Assurance Program Topical Report WPPSS-QA-004, emphasize the licensee's commitment to the details of the Regulatory Guide. The RG-1.33 Part 1.c prescribes certain administrative procedures "Equipment Control (e.g. locking and tagging)" and the FSAR Section 13.5.1.3 clarifies that such administrative procedures include rules and instructions pertaining to clearance orders.

The Plant Procedure 1.3.8 Revision 6 requires:

- (1) In section 1.3.8.2.E: "A change of clearance status is made only after the Shift Manager has reviewed the proposed change and determined that the change does not compromise the initial clearance order.... The addition and/or deletion of tags will be recorded in the "Tag Location" section and the changes initialed by the Shift Manager."
- (2) In section 1.3.8.2.C.1.a: "...the Shift Manager will authorize release of the Clearance Order by the following procedure... a. Indicating "Redundant Verification" is required when the component's safety related or fire protection."

Contrary to the above, on March 28, 1984 addition of four tags (CRD-C-112, 101, 102, and 113) were made to each of three clearance

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orders (84-3-317, 318, and 319) for work on the control rod drive system hydraulic control units (HCU-4239, 4643, and 4207):

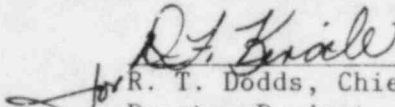
- (1) Without the changes initialed by the Shift Manager.
- (2) Without the "Redundant Verification Required" indicated on any of the three clearance orders.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JUN 29 1984

Dated

  
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R. T. Dodds, Chief  
Reactor Projects Section 1