

APPENDIX A

NOTICE OF VIOLATION

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

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

As a result of the inspection conducted during June 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. Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained covering "The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978" and "The applicable procedures required to implement the requirements of NUREG-0737". Regulatory Guide 1.33 states that typical safety related activities to be covered by written procedures include "Bypass of safety functions and Jumper Control". NUREG-0737 item I.C.6.3 states that "Except in cases of significant radiation exposure, a second qualified person should verify correct implementation of equipment control measures such as tagging of equipment". The WPPSS Procedure 1.3.9 contains implementing details of the above requirements and specifies that procedures "shall be used for all safety-related and non-safety-related systems." It allows that jumpers "positively identified in approved procedures are excluded from the requirements of this procedure. To qualify for the exclusion, the other procedure must: "a. Clearly specify that the Shift Manager must be notified prior to installation and removal, b. The other procedure identifies the need for independent verification of installation and removal, and e. The jumpers or lifted lead tags are controlled by the Shift Manager and are issued by him to the procedure used to control the work."

Contrary to the above, on June 25, 1984, Supply System technicians used procedure 7.4.3.3.1.44, which involved the installation of two jumpers, but the procedure did not "Clearly specify that the Shift Manager must be notified prior to installation and removal" nor did it identify "the need for independent verification of installation and removal". The Shift Manager was not notified prior to the installation or removal of the jumper and did not issue a jumper tag "to the procedure used to control the work". The jumpers were applied to the initiation logic of the engineered safeguard auto depressurization system.

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

- B. 10 CFR 50 Appendix B establishes requirements that apply to all activities affecting the safety-related functions of structures, systems and components; these activities include "...testing, operating, maintaining, repairing..." Criterion XVI of Appendix B requires, in part, that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, ... are promptly identified and corrected." WPPSS compliance with this requirement is reiterated in the WPPSS Operational Quality Assurance

Program Description (WPPSS-QA-004) Section 16.2.1, as referenced in the FSAR Section 17.2.

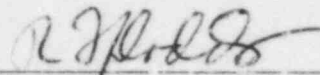
Contrary to the above, between April 3, 1984 and July 2, 1984 the licensee failed to take prompt and effective corrective action for the malfunction/deficiencies in the emergency core cooling system logic associated with assuring that low pressure cooling is functional prior to permitting automatic depressurization of the reactor core, under certain design basis loss of coolant conditions described in FSAR Section 7.3.1.1.1.1. On July 2, 1984 the reactor was at rated temperature and pressure with the LPCI pump running permissive signal closed (listed in Technical Specification Table 3.3.3-1 items A.2.e and B.2.e), although no low pressure coolant injection pumps were actually running.

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.

AUG 7 1984

Dated



R. T. Dodds, Chief
Reactor Projects Section 1