

REVISED
NOTICE OF VIOLATION

Washington Public Power Supply System
Washington Nuclear Project-2

Docket No. 50-397
License No. NPF-21
EA 97-138

During an NRC inspection completed November 18, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50.59 states, in part, that a licensee may make changes in procedures as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the technical specifications.

WNP-2 Technical Specifications 1.36, 1.19, and 1.12, (WNP-2 License Amendment No. 137, 98, and 94, respectively) define REACTOR PROTECTION SYSTEM RESPONSE TIME, ISOLATION SYSTEM RESPONSE TIME, and EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME to be the time interval from when the monitored parameter exceeds its actuation setpoint at the channel sensor until appropriate equipment actuations are completed (e.g., deenergization of scram pilot valve solenoids, isolation valve travel to required positions, or required ECCS equipment response such as pump discharge pressures reaching required values).

WNP-2 Technical Specification 4.3.1.3 (WNP-2 License Amendment No. 139) requires that the REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip functional unit shall be demonstrated to be within its limit at least once per 18 months.

WNP-2 Technical Specification 4.3.2.3, (WNP-2 License Amendment No. 139) requires that the ISOLATION SYSTEM RESPONSE TIME of each isolation trip function shall be demonstrated to be within its limit at least once per 18 months.

WNP-2 Technical Specification 4.3.3.3, (WNP-2 License Amendment No. 139) requires that the ECCS RESPONSE TIME of each ECCS trip function shall be demonstrated to be within its limit at least once per 18 months.

Contrary to the above, in April 1996, the licensee made changes to procedures as described in the safety analysis report without seeking prior Commission approval, and the changes had the effect of changing technical specification requirements. Specifically, the licensee changed surveillance procedures which implemented the provisions of WNP-2 Technical Specifications 4.3.1.3, 4.3.2.3, and 4.3.3.3, and performed response time measurements in 1996 which were not in accordance with the above technical specification requirements. The testing did not include the time interval for sensor response in the RESPONSE TIME measurement for certain instruments in the Reactor Protection System, Isolation Actuation System and the Emergency Core Cooling System. (01014)

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

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in the Supply System's letters dated January 20, and March 19, 1998, and NRC Inspection Report No. 50-397/96-22. 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, 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 choose to respond, your response will be placed in the NRC Public document Room (PDR). Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Dated at Rockville, Maryland
this 13th day of October 1998

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