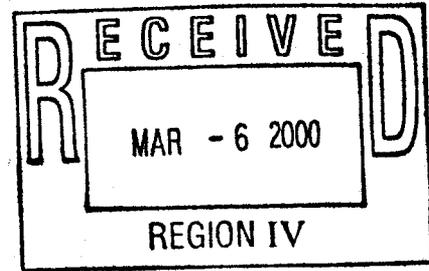


IA 99-051

February 28<sup>th</sup>, 2000



Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive Suite 400  
Arlington, TX 76011

SUBJECT: Reply to a Notice of Violation

Dear Sirs:

This letter is in response to the findings of the Nuclear Regulatory Commission in regards to incidents that occurred on April 16, 1999. In a letter dated November 9, 1999 your office stated that upon review of the Office of Investigations Report No. A4-1999-020, it was your conclusion that I had engaged in "deliberate misconduct" in two instances. I was given the opportunity to (1) respond to the apparent violations within 30 days of the date of the letter or (2) request a predecisional enforcement conference within 7 days of receipt of the letter. I chose to respond in writing and forwarded a letter to your office explaining my actions on April 16, 1999.

As pursuant to the provisions of 10 CFR 2.201, I am hereby submitting in writing to the U.S. Nuclear Regulatory Commission my explanation for the violations that occurred on April 16, 1999. It is my understanding that I may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. I believe my previous(undated) letter to the U.S. Nuclear Regulatory Commission addressed all of the issues including (1) the reason for the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Therefore, I am enclosing a copy of this correspondence for your perusal.

I have never denied my participation in the events that unfolded on April 16, 1999. I have tried to be as honest and straightforward in my responses as I could be and have taken responsibility for my actions on that day. I respect the decision of the U.S. Nuclear Regulatory Commission and wish to assure this office that I do understand the significance of my violations. RWP's are sanctioned and imposed for specific safety reasons and should not be deviated from except in the most extreme circumstances.

Sincerely,

A handwritten signature in cursive script that reads "Steve Templeton".

Steve Templeton

Docket 50-482  
License NPF-42

Mr. Steve Templeton  
[REDACTED]  
[REDACTED]

United States Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

SUBJECT: NRC Investigation Report No. A4-1999-020

Dear Sirs:

This letter is in response to the findings of the Nuclear Regulatory Commission in regards to incidents that occurred on April 16, 1999. In a letter dated November 9, 1999 your office stated that upon review of the Office of Investigations report, it was your conclusion that I had engaged in "deliberate misconduct" in two instances. I would like to take this opportunity to reiterate the events of that day & further explain why I took the actions I did. I would also like to show the corrective steps that have been taken by myself & my superiors in order to avoid such an incident from occurring again.

At this time, I would like to "recap" the events of April 16, 1999:

On April 16, 1999 I arrived at work at approximately 5:30am to begin my shift. "Turnover" started at 6:30am, so I got ready and went into containment to get "turnover" from the nightshift generator crew. I also checked to see if everything was ready for the nozzle dam job. After the nightshift crew left, I had to cover the Westinghouse crew that was finishing up their work and getting things ready for the dayshift Westinghouse crew. This task was only supposed to take approximately ten to fifteen minutes but ended up taking almost an hour. Consequently, I was late for the 7:30am morning briefing at the outage trailer for the dayshift steam generator jumps. At approximately 8:00am, [REDACTED] my manager, called me and asked why I was not at the briefing. I explained to [REDACTED] that I was covering the nightshift steam generator crew and that as soon as they were out of the area I would be there. [REDACTED] stated that they would not start the briefing until I arrived. When I arrived at the outage trailer for the briefing, everyone involved in the steam generator jump job was exiting the outage trailer. When I inquired as to why they had not waited on me to start the briefing, [REDACTED] my supervisor, informed me that "nothing had changed" and that [REDACTED] a health physics contract worker, would brief me on the way into containment.

[REDACTED] & I entered containment at approximately 9:00am and proceeded down to the 2000 level to cover the steam generator jumpers. Our responsibilities were to dress out three jumpers for Steam Generator "C" and three jumpers for Steam Generator "B" into bubble suits. We were also responsible for undressing jumpers out of the bubble

suits when they were finished with their tasks of installing the steam generator nozzle dams. The first three jumpers were suited up and proceeded to enter the platform area to start their "jump" on Steam Generator "C". At this point, when the three jumpers entered the upper platform of the steam generators, the console technicians were in charge of them until they exited the upper platform. The console technicians were [REDACTED]

[REDACTED] Next, we suited up the next three jumpers and on their way to the Steam Generator "B" platform, one of the jumpers lost his airflow to his bubble suit. This particular jumper was new to steam generator jumping and by the time I realized he had lost his airflow, he was getting very panicky and the bubble hood was collapsing around his head. I noted that the jumper had a razor knife in each hand and was prepared to cut himself out of the bubble suit. I ran outside of the bioshield, grabbed an extra airline and hooked it up to his bubble suit. By this time, the jumper was really starting to look pale and was acting weirdly. I had no way of communicating with the jumper other than shouting. The new airline that I had hooked up to his bubble suit did not have the proper communication line hooked to it. At this time, I was extremely worried about the jumper's well being and I needed to establish direct communication with him to determine his state of mind. There was another communication line inside of the lower playpen & I instructed deconner [REDACTED] to cross over the second step-off pad and bring the other communication line to me. [REDACTED] stated that he did not have a faceshield on that was required to enter the area. I assured him that I had just posted the area and that I knew the area was not that contaminated. At this point, my main concern lay with the jumper who was in trouble. [REDACTED] retrieved the communication line, which we hooked up to the jumper's suit. After re-establishing communication with the jumper, he assured me that he was all right & I let him continue on to the steam generator platform. At this time, console operator [REDACTED] paged me on the plant Gai Tronics system. When I answered the page, [REDACTED] asked me why there was a deconner on the steam generator platform without a bubble suit on. I told [REDACTED] that there was not a deconner on the steam generator platform and [REDACTED] informed me that Brad Smallridge, the NRC inspector, and [REDACTED] health physics ALARA supervisor, could see him on the platform. I explained that the deconner was not on the steam generator platform, but rather in the steam generator "playpen". [REDACTED] informed me that I was correct and that they had been looking at the wrong console camera. At this point, I was becoming very stressed. I had deconner [REDACTED] leave the bioshield and do a whole-body frisk. He was OK.

At approximately 11:00am the steam generator nozzle dam jump was complete. [REDACTED] undressed the first two jumpers while I was answering a phone call from [REDACTED]. [REDACTED] stated that [REDACTED] wanted me to get a survey of the steam generator platform before the deconners went up and rolled up the layer of herculite. I explained to [REDACTED] that was not the way we had discussed doing the job in all the planning and briefings that we had previously. [REDACTED] stated that [REDACTED] wanted it done this way. I explained to [REDACTED] that I would have to call [REDACTED] back as we were trying to get the steam generator jumpers undressed and I did not have time to discuss the matter at the moment. I returned to the steam generator area inside of the bioshield to finish undressing the steam generator jumpers. When I arrived, [REDACTED] was arguing with one of the jumpers and I asked what the problem was. The steam generator jumper said, "this [REDACTED] doesn't know how to undress steam generator jumpers". [REDACTED] got mad and left the area &

I was left there by myself to undress the last four jumpers. While I was undressing the last jumper, [redacted] returned and said that [redacted] wanted to speak with me ASAP. I instructed [redacted] to tell [redacted] that as soon as I was finished undressing this last jumper, I would call [redacted] back. When I finished my job, I returned [redacted] call. [redacted] wanted to know the results of the survey of the steam generator platform. I explained to [redacted] that I had not had time to do the survey yet as I had just finished undressing the steam generator jumpers. I told [redacted] that as soon as I gathered my survey supplies, I would do the survey and call [redacted] back with the results. Less than five minutes later, the phone was ringing again and it was [redacted] wanting to know if I had got the survey done yet. I told [redacted] I was still gathering supplies and [redacted] informed me to "hurry up" because [redacted] needed the survey results. When I hung up the phone, I said, "I wonder who is running this show...me or [redacted]". As I was entering the lower steam generator playpen area to do the survey, I saw the deconners coming down from the upper steam generator platform carrying a bag of herculite. I asked them what they were doing and they said that they had just finished rolling up and bagging the herculite as we had discussed in the pre-job briefings and planning. They asked if this was the correct procedure and I stated that it was and that they had done a good job and had done what they were supposed to do. Unfortunately, I had been so busy and had been faced with so many problems during the course of the steam generator jump; I had neglected to inform the deconners that I needed to get a survey before they rolled up the herculite. When I told the deconners that they had "done what they were supposed to do", I was referring to the fact that we had pre-job planning and briefings and during those briefings it was understood by the deconners that after the last steam generator jumper came down from the upper steam generator platform, they were to be ready to go up to the steam generator platform and roll up the first layer of herculite underneath each of the steam generators. The reason for doing this is for contamination control. In case anything might have been pulled out of the steam generator after the nozzle dam installation, both of the deconners were wearing DMC 100 Teledosimeters, which was monitored by the HP console operators. [redacted] There was also several DMC 100's (Telemetric Dose Rate Instruments) placed around the upper steam generator platform. By using DMC 100's, the deconners were always in continuous HP coverage by the HP console operators.

After I did the steam generator platform survey, it was approximately 1:30pm. I called [redacted] and gave [redacted] the results of the survey. At that time, [redacted] told me that when I came out of containment I needed to come and see [redacted] as [redacted] had something [redacted] needed to discuss with me. Shortly after my last phone conversation with [redacted] Westinghouse personnel started returning to containment to continue work on the steam generator platform. This was approximately around 2:00pm. Also, at around that time, a couple of the 2047' level containment HP technicians showed up at the 2000' level steam generator checkpoint to give me a "hand". They stated that [redacted] had told them to get down there and help me out so I could get out of the containment building. The two technicians that [redacted] sent were not briefed or authorized to work on the steam generator RWP. They stated that they had informed [redacted] of this and [redacted] told them to get down there anyhow and help out. At approximately 2:30pm, [redacted] arrived to relieve me and stated that [redacted] really needed to see me. I "turned over" to [redacted] and exited the

containment building. At this point, I was feeling very stressed out and needed a "breather". I went outside to have a cigarette, my first break since I had arrived at work that morning. While outside, I ran into [REDACTED]. I asked them if it was their understanding that they were to roll up the herculite and bag it when the last steam generator jumper came off of the platform. They both responded that yes, that was what we had planned. I then asked them if anyone had told them anything different in the 8:00am morning briefing and they both replied "no". I said "good" and told them that they had done what was expected of them. At approximately 3:30pm I saw [REDACTED] and [REDACTED] told me that [REDACTED] would like to see [REDACTED] and I in [REDACTED] office at 4:30pm and that I may want to have a Union Steward present at the meeting. At 4:15pm [REDACTED] called me and told me that our meeting with [REDACTED] had been postponed until 6:30pm in [REDACTED] office. At 6:30pm I went to [REDACTED] office with Union Steward [REDACTED] and discussed the day's events with [REDACTED] and [REDACTED]. Later that evening, at approximately 9:00pm, [REDACTED] called me at home and told me that [REDACTED]. On April 22, 1999 I was called into work by [REDACTED] and was instructed to meet [REDACTED] at the Human Resources building. At that time, [REDACTED].

This is my response to the first violation:

The main reason, the only reason, I sent [REDACTED] into the area without a faceshield that day is obvious: **SAFETY**. Safety is the first priority here at Wolf Creek. When the steam generator jumper lost his air, he became frantic and I believed he was on the verge of either passing out inside a contaminated area or trying to cut himself out of the bubble suit with the razor knives he held in each hand. I knew the contamination conditions of the playpen and that they would not be detrimental to [REDACTED] as I had just done a survey on the area. It was a situation that required a split-second decision, and at the time, I felt I made the correct decision.

Safety was the main reason for my decision, but I was also faced with these Human Error Traps that day:

1. **Time Pressure** – I was under the impression that this was a "critical path" job, that it was to be finished no matter what. It was only later that evening, in [REDACTED] office, that I learned that it was NOT a "critical path" job. But, if the steam generators were not a "critical path" job, why was I so "time pressured" and why didn't they wait for me at the morning briefing? I certainly felt an "urgency" to get the job finished.
2. **Distractive Environment** – Not only was I faced with the dilemma of a jumper losing his airline, but during the course of the job, I was paged by console operator [REDACTED] and questioned about a deconner being on the steam generator platform (which he was not) and I was paged numerous times by [REDACTED].
3. **High Workload** – This was the first time that two steam generators had been jumped at the same time. This requires a lot of manpower. There were only two HP

Technicians in the containment building to cover the Steam Generator on dayshift, while the nightshift had four HP Technicians. Last outage, there were seven technicians on days covering only one steam generator at a time.

4. **First Time Evolution(as HP Tech)** – This was the first time I had covered a job of this magnitude since becoming a HP Tech. I had helped support the job previously, but as a deconner.
5. **Vague and Incorrect Guidance** – First, the morning briefing on the job should not have taken place without me present. I cannot be properly “briefed” while on my way to do what I thought was a “critical path” job, by another HP Tech. Second, I feel like I was being “micro-managed” over the telephone by [REDACTED]. If [REDACTED] felt I was “falling down on the job”, why didn’t [REDACTED] come down to containment [REDACTED] and find out what the problem was or stop the job?
6. **Work Stress** – Take all the above factors plus the fact that I had not had a break since arriving at work at 5:30am that morning...approximately nine hours straight.

Now, I would like to respond to the second apparent violation; intentionally failing to survey the steam generator platform.

First, I would like to state that in no way was I trying to be [REDACTED]. I had every intention of doing the survey; I just did not have the time to do it immediately. With all of the problems that arose, I simply forgot to inform the deconners that the plan had changed and that [REDACTED] had requested a survey of the area first before they entered and rolled up the herculite. We had several meetings before the steam generator job with everyone involved, including [REDACTED] and the plan was always to roll up the herculite immediately after the last steam generator jumper was off of the steam generator platform. The reasons for this were to control the spread of contamination and to practice ALARA. I have worked several outages as a deconner and we always rolled up the herculite before the HP did the survey. If I had done the survey first, then had the deconners go up and roll up the herculite, I would have then had to go back up and do another survey. That would have made two trips for me and that is not good ALARA practice. As I stated before, both deconners were wearing DMC 100 Teledosimeters and also there were several DMC 100's placed on the steam generator platform. By wearing the DMC 100's, the deconners were in continuous coverage by the HP Console Operators, [REDACTED]. I do not know why suddenly [REDACTED] wanted to get a survey first. Perhaps [REDACTED] wanted to see if something highly radioactive fell out of the steam generator. Although, if this would have happened, the DMC 100's would have detected it immediately due to the increased “background” on the steam generator platform. Still, [REDACTED] is my supervisor and I had every intention of following [REDACTED] request. It was strictly human error on my part. [REDACTED]

In closing, I would like to say that I have learned some valuable lessons from the mistakes that were made that day. First, I should have insisted that the job not begin until I could be properly briefed. Second, I should have stopped the job the moment I felt

there was trouble with the steam generator jumper. And third, I should have conveyed to [redacted] that I was feeling "pressured" and that the reason I could not do the survey was simply because I did not have the time or the manpower needed...perhaps then [redacted] would have stopped the job.

I would also like to state that I feel management did not provide adequate support on this job. Radiation Protection Procedure RPP 01-105 5.2.2 states: "HP supervisors are responsible for stopping any work in progress or ordering an area evacuated, when in their judgement, the radiological conditions warrant such action and such actions are consistent with personal safety". Both supervisors had ample opportunity to stop the job when various problems arose. The Console Room Control Supervisor could have stopped the job when [redacted] witnessed the deconner entering the playpen area without a faceshield. And, apparently, my supervisor, [redacted] felt something was "amiss" and could have stopped the job at any time or called a "time out".

My Radiation Protection Manager failed to include me in the pre-job briefing after [redacted] had assured me that they would wait for me before proceeding with the meeting. This resulted in me receiving a "second-hand" brief from [redacted]. Also, [redacted] failed to provide me with the necessary manpower to properly cover the work as expected.

I have been punished for my actions on April 16, 1999. I was [redacted]  
[redacted] I do not necessarily agree with my punishment, but I accept it and have learned from my mistakes.

Sincerely,



Steve Templeton  
[redacted]