

NMC > Sites > Point Beach - Action Request > Corrective Actn Program (CAP) AR Section 1

RP

RAD. PROT.

Activity Request Id: CAP055371 Activity Type: CAP Submit Date: 4/6/2004 4:24:33 AM

One Line Description: Open Access to Locked High Radiation Area

Detailed Description: 4/6/2004 4:24:33 AM - LINDSAY, JOHN: This has been identified during a NOS assessment

Problem: The rear wall area of the Regen Heat Exchanger Cubicle in U-1 Containment has an opening in the screen which would allow entry of a portion or all of the body into a High Radiation Area >1000 mr/hr. The opening does not have a flashing light, as allowed by Technical Specification 5.7.2.f in lieu of a locked door or gate, nor is it barricaded and conspicuously posted as required. This condition has existed since the beginning of the current outage, and per discussions with radiation protection personnel, Radiation Protection has been aware of the condition.

Requirement: 10CFR20.1902(b), "Posting of high radiation areas" states "The licensee shall post each high radiation area with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION, HIGH RADIATION AREA" or "DANGER, HIGH RADIATION AREA." 10CFR20.1003, "Definitions", states "Entrance or access point means any location through which an individual could gain access to radiation areas or to radioactive materials. This includes entry or exit portals of sufficient size to permit human entry, irrespective of their intended use."

10CFR20.1003, "Definitions", states "Whole body means, for purposes of external exposure, head, trunk (including male gonads), arms above the elbow, or legs above the knee."

Technical Specification 5.7.2.f, discussing High Radiation Areas with dose rates exceeding 1.0 rem/hr, but less than 500 rads/hr, states "Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device."

USNRC Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants", in Section 2.4 "Alternative Methods for Access Control" states "Each high radiation area as defined in 10 CFR Part 20 should be barricaded and conspicuously posted as a high radiation area", and in a footnote for "barricaded" states "A barricade can be a rope, ribbon, or other firmly secured, conspicuous obstacle that (by itself or used with physical barriers such as existing walls or hand railings) completely surrounds the area and obstructs inadvertent entry".

Initiator: LINDSAY, JOHN Initiator Department: NP QA PB Date/Time of Discovery: 4/6/2004 4:21:20 AM Date/Time of Occurrence: 4/6/2004 4:21:20 AM Identified By: QA/Nuclear Oversight System: (None) Equipment # (1st): (None) Equipment Type (1st): (None) Equipment # (2nd): (None) Equipment Type (2nd): (None) Equipment # (3rd): (None) Equipment Type (3rd): (None) Site/Unit: Point Beach - Unit 1 Why did this occur?: 4/6/2004 4:24:33 AM - LINDSAY, JOHN: Causes/Contributors: Relaxed standards for conservative posting of radiological areas. Lack of sense of urgency in correcting a recognized deficiency.

Other Insights: The posting program at PBNP needs to be benchmarked against top performing plants.

Immediate Action Taken: 4/6/2004 4:24:33 AM - LINDSAY, JOHN: Discussed concerns with RP Supervision and NOS Supervision. Notified Outage Control Center of condition and NOS concern. Generated CAP.

Recommendations: 4/6/2004 4:24:33 AM - LINDSAY, JOHN: Barricade and post the area in accordance with Technical Specification 5.7.2.f until a permanent solution is emplaced. Determine compliance/reportability.

Notify Me During Eval?: Y SRO Review Required?: Y

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 5

FOIA-2004-0282

L-6

## Section 2

<b>Operability Status:</b>	NA	<input checked="" type="checkbox"/> <b>Compensatory Actions:</b>	N
<b>Basis for Operability:</b>	4/6/2004 6:03:43 AM - HASTINGS, MARTIN: No equipment operability is in question. There is a difference of opinion between the initiator and RP management. RP's position is that the area in question is not an entryway. The opening in question does have a posting approx 3 feet away. The screen is in place to prevent entry, and the screen is posted. The actual entryway on the other side of the cubicle is posted and locked.		
<input checked="" type="checkbox"/> <b>Unplanned TSAC Entry:</b>	N	<input checked="" type="checkbox"/> <b>External Notification:</b>	N

## Notes/Comments

Update to CAP055371 by SHANNON, DAN (4/6/2004 5:27:54 AM)

The subject of this CAP was discussed with the RPM prior to NOS identifying this issue and writing the CAP. Also, I discussed this issue with the initiator and presented the RP management disagreement with his interpretation of 10CFR20, TS 5.72., and RG 8.38.

The area behind the U1 Regen HX cubicle has a metal barricade in place to prevent inadvertent entry and is conspicuously posted as a Locked High Radiation Area. It is the opinion of the RPM that this barricade and posting meets the intent of RG 8.38, TS 5.7.2, and 10CFR20 for high radiation areas greater than 1000 mrem/hr and thus does not represent a condition of non-compliance or a reportable event.

An evaluation of this specific barrier was initiated prior to the outage (ref. OTH 056800, due 4/9/04) to determine if there was a method to enhance this barrier. This evaluation was initiated based on industry experience regarding interpretations of barrier acceptability for HRA/LHRAs.