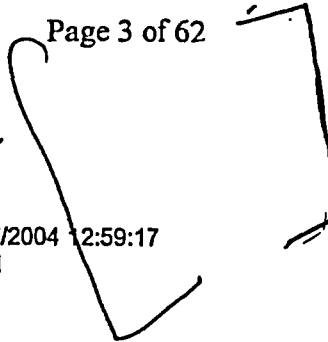


RP

Ex. 5



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

Activity Request Id: CAP055426

Activity Type: CAP

Submit Date:

4/7/2004 12:59:17 PM

One Line Description: Unposted Access to a High Radiation Area

Detailed Description: 4/7/2004 12:59:17 PM - WALES, RUSS: This was identified during NOS Rapid Trending.

Problem: NOS identified an access to a High Radiation Area that was not posted nor barricaded as a High Radiation Area as required by standards.

On 4/7/04 at about 1100, NOS identified that access could be gained to a High Radiation Area. This access point was not posted nor barricaded. The access point is located between the 21' and 47' elevation of the east stairwell in Unit 1 Containment. NOS has noted that it is possible for an individual standing on the stairwell platform between these two elevations, to climb through the handrail and step out on to the walkway that is adjacent to the 1W-1C1 - U1C Accident Recirculation fan (approximately 2 feet separation). There is also a pipe that would help to bridge this gap if an entrant wanted to use it, but it is not needed to get to this walkway. This walkway runs by an RHR pipe and over to a ladder that goes down to the 21 foot elevation next to the Keyway. The area near the RHR pipe (the radiation source) is a High Radiation Area. In addition, the area that the ladder leads down to is the 21' elevation near the entrance to the Keyway. This area is already posted as a High Radiation Area with a posted entrance from the 21' elevation.

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."

Technical Specification 5.7.1.a, discussing High Radiation Areas with dose rates not exceeding 1.0 rem/hr, states "Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area."

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".

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 5 FOIA PA-2004-0282

Initiator: WALES, RUSS Initiator Department: NP QA PB
Date/Time of Discovery: 4/7/2004 11:00:00 PM Date/Time of Occurrence: 4/7/2004 11:00:00 PM
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?: 4/7/2004 12:59:17 PM - WALES, RUSS: Causes/Contributors: Unknown.

Other Insights: There is the potential that the area that this access leads to is no longer a High Radiation Area. Radiation Protection was going to perform a survey as a result of Nuclear Oversight's observation. Those survey results were not yet available at 1245. The survey results will determine if this is still a High Radiation Area. Regardless of the results, this access

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point was not posted earlier in the outage when it should have been.

4/7/2004 2:35:16 PM - STALZER, CHARLES:

Update: In discussion with the RP station, the area in question was surveyed and was not a high radiation area. The area has since been deposited.

Immediate Action Taken: 4/7/2004 12:59:17 PM - WALESH, RUSS:

Informed the Radiation Protection Technician in the area. He immediately posted the area as "High Radiation Area – No entry at this point" and barricaded it with a rope barrier.

Informed the Radiation Protection supervisors. They said they would have a survey performed. Those results were not yet available at 1245.

Recommendations: 4/7/2004 12:59:17 PM - WALESH, RUSS:

Evaluate how this potential entrance point was missed. Consider Extent of Condition. NOS has identified several other areas in containment that needed to be reposted or barricaded further during this outage (CAP055340, CAP055371).

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

Section 2

Operability Status: NA **Compensatory Actions:** N

Basis for Operability: 4/7/2004 2:35:16 PM - STALZER, CHARLES:
This does not affect plant equipment operation, but evaluation needs to be done to determine if any actions are required based on the CAP's observation.

Unplanned TSAC Entry: N **External Notification:** N