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June 30, 1989

Re: Indian Point Unit No. 2
Docket No. 50-247

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Response to Inspection Report 89-13

Enclosed is our response to the violation identified in the subject report.

Should you or your staff have any questions on this matter, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs and Safety Assessment.

Very truly yours,



cc: Mr. William Russell
Regional Administrator - Region I
US Nuclear Regulatory Commission
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Violation

As a result of the inspections conducted on April 24 to May 5, 1989, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Technical Specification 6.11, "Radiation Protection Program", requires, in part, that procedures for personnel radiation protection shall be adhered to for all operations involving personnel radiation exposure.

SAO 300, "Radiation Protection Plan", requires, in part, in section 2.0, that all individuals working at Indian Point Station shall "wear personnel monitoring devices where required by signs, Radiation Work Permits (RWPs), or as specified by Radiation Protection personnel; wear protective clothing and respiratory protection equipment properly whenever required by postings, RWPs, or by Radiation Protection personnel.

Contrary to the above:

1. On April 26, 1989, on the 65 foot elevation of containment, the inspector observed an individual inside the number 26 Fan Cooling Unit, which was posted "Respiratory Protection Required", not wearing the required respiratory protection. The individual was working under RWP 15474 which allowed entry into the number 22 Fan Cooling Unit, this room did not require respiratory protection.
2. On April 27, 1989, in the pipe penetration area of the PAB, the inspector observed an operator inside an area which was posted "Dosimetry Required on Knee" not wearing the required dosimetry on his knee.
3. On April 27, 1989, in the pipe penetration area of the PAB, the inspector observed three individuals inside an area which was posted "Beta Protection Required", not wearing the required beta protection. The individuals were working under RWP 14741, which required face shields to be worn, and were not wearing face shields as required by the RWP.
4. On April 27, 1989, in the pipe penetration area of the PAB, the inspector observed an individual, working under RWP 13898 which stated "non kneeling on floor", kneel on the floor for approximately five minutes.

Response

The four separate instances stated in the Notice of Violation are symptomatic of a common issue - failure by a worker to adhere to established procedures. Responsibility for ensuring compliance with established plant procedures lies with the worker and first line supervisor. In the cited examples, individuals representing Operations, Maintenance and Contractors were remiss. Immediate corrective action was documented with Radiological Occurrence Reports and individual disciplinary action was taken ranging from withdrawal of site access authorization to memorandums of reprimand, dependent upon the severity of the violation.

Longer term remedial action consists of assuring adherence to plant policies that are already in effect. By Station Administrative Order, first line supervisors are responsible for compliance with procedures by their subordinates regardless of the scope of the procedure. Additional instruction will be provided to supervising personnel to re-inforce this responsibility.

Surveillance of compliance with plant policy in the area of health physics rests with the Technical Services Department. By procedure this Section has the responsibility for periodic surveillance/compliance of the Radiological Controlled Area and to document any unsatisfactory radiological conditions or practice relative to radiological safety.

In summary, it is believed that the violations occurred due to instances of non compliance with plant policies and procedures already in effect. Heightened sensitivity and awareness on the part of personnel and their supervisors directly involved in daily activities as well as those charged with surveillance is warranted. The additional intra-departmental training is referred to above intended to achieve this objective. All levels of management perform oversight functions inside the Radiological Controlled Area (RCA).