

ACTION REQUEST 00242461

Type : NCR Orig Date: 08/09/07 15:53 Discovery Date:
Subject : LOW LEVEL CONTAMINATION IDENTIFIED IN F PAD DITCH

Description
ROUTINE ENVIRONMENTAL SOIL/WATER SAMPLING HAS IDENTIFIED LOW LEVELS OF TRITIUM (APPROX. 600 PCI/L, CS-137(2E-8 UCI/GM), AND CO-60 (5E-8 UCI/GM). THIS AREA RECEIVES RUNOFF FROM THE PROTECTED THROUGH DRAINAGE PIPES UNDER THE ROAD. THE MAIN DITCH IS LOCATED INSIDE A FENCED AREA CURRENTLY POSTED AS A RADIATION AREA. THIS IS A REOCCURANCE HAVING BEEN IDENTIFIED AND ADDRESSED IN NCR 98-01596.

Priority : 3 Report To : Status: COMPLETE 04/28/08
Due Date : 05/15/08 Event Date :

Originator : HINSOW Originator Group:
Facility : BNP Department : K34 Organization:

Owed To : Owed To Group : ERCUEVAL
Owed To Fac: BNP Department : Discipline :

AR Status History

Updated Date	Updated By	AR Status	AR Due Date
08/09/07	HINSOW	INPROG	
08/09/07	HINSOW	H/APPR	
08/16/07	HOLLEN	PRE-APRV	
08/16/07	HOLLEN		02/09/08
08/16/07	HOLLEN	APPROVED	
11/28/07	HOLLEN		03/27/08
03/24/08	HOLLEN		05/15/08
04/28/08	HOLLEN	COMPLETE	

J-89

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Request Attribute	Value	Reqd	Date
1A POT'L OPER/REPORT	N	Y	08/09/07
Name :	WILLIAM HINSON		

Request Attribute	Value	Reqd	Date
1B EQUIPMENT RELATED	N	Y	08/09/07
Name :	WILLIAM HINSON		

Request Attribute	Value	Reqd	Date
2 SUPERVISOR REVIEW		N	
Name :			

Request Attribute	Value	Reqd	Date
2A CR VALID?	Y	Y	08/09/07
Name :	JEFFERY FERGUSON		

Request Attribute	Value	Reqd	Date
2B FURTHER INVN REQD	Y	Y	08/09/07
Name :	JEFFERY FERGUSON		

Information to include for No Further Investigation Required
Include the following information for Priority 2:

- * Inappropriate Act statement (include work group involved, if known)
- * Apparent Cause including code
- * Completed Corrective Actions - CORR, or
- * Additional Corrective Actions if needed - including recommended assignee and recommended due date

Include the following information for Priority 3:

- * Completed Corrective Actions - CORL, or
- * Additional Corrective Actions if needed - including recommended assignee and recommended due date

Request Attribute	Value	Reqd	Date
2C RECOMMENDED OWNER	E&RC	N	08/09/07
Name :	JEFFERY FERGUSON		

Request Attribute	Value	Reqd	Date
2D OPER/REPORT ISSUE	N	Y	08/09/07
Name :	JEFFERY FERGUSON		

Request Attribute	Value	Reqd	Date
2D1EQUIPMENT RELATED	N	Y	08/09/07
Name :	JEFFERY FERGUSON		

Request Attribute	Value	Reqd	Date
2E MAINT RULE APPLIC	N	N	08/09/07
Name :	JEFFERY FERGUSON		

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Request Attribute	Value	Reqd Date
2F SYSTEM	8510	Y 08/13/07
Name : SYLVIA	EDWARDS	

Changed from N/A to 8510 per Jim Boone, MR Coordinator. sde 8/13/07

Request Attribute	Value	Reqd Date
3 OPERATIONS REVIEW		N
Name :		

Request Attribute	Value	Reqd Date
3A IMMEDIATE REPT ISSUE	N	N 08/10/07
Name : STEVEN	GORDY	

A Licensee Event Report (LER) is due to the NRC only if any liquid effluent release, when averaged over a time period of 1 hour, exceeds 20 times the applicable concentrations specified in Appendix B to Part 20, Table 2, Column 2, at the point of entry into the receiving waters (i.e., unrestricted area) for all radionuclides except tritium and dissolved noble gasses. Reference 10CFR50.73(a)(2)(viii).

This is less than the 1.0E-3 listed in App B to Part 20.

ORCI-06.1, Attachment 1, has the exact same criteria for mandatory reporting.

For voluntary reporting, Attachment 1, page 18 and 19, specifies that a report should be made if an inadvertent unmonitored leak or spill has or can potentially get into groundwater that is used for drinking water or could be used for drinking water.

We do not have any reason to believe that this leak can get into any drinking water.

Request Attribute	Value	Reqd Date
3B OCR	N	N 08/10/07
Name : STEVEN	GORDY	

If an OCR is needed, enter the following information:

1. Basis for reasonable expectation of operability -
2. Person responsible for completing the OCR -
3. Date and time the OCR is due, as determined by the Manager of Operations -
4. Basis for the timeframe allowed -

Request Attribute	Value	Reqd Date
3B1 OPER ISSUE	N	N 08/10/07
Name : STEVEN	GORDY	

Request Attribute	Value	Reqd Date
3B2 REPORT ISSUE	N	N 08/10/07
Name : STEVEN	GORDY	

Request Attribute	Value	Reqd Date
3B3 REW	N	N 08/10/07
Name : STEVEN	GORDY	

Request Attribute	Value	Reqd Date
3B4 DEG/NCON	N	08/10/07
Name : STEVEN	GORDY	

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Request Attribute	Value	Reqd	Date
3C TRACKING NUMBER	THIS AR	N	08/10/07
Name :	STEVEN GORDY		

Request Attribute	Value	Reqd	Date
4 REG AFF REVIEW		N	
Name :			

Request Attribute	Value	Reqd	Date
4A OPER/REPORT ISSUE	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4A1 OPER ISSUE	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4A2 REPORT ISSUE	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Low level < REMP/ODCM and no potential to get in drinking water.

Request Attribute	Value	Reqd	Date
4A3 REW	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4A4 DEG/NCON	N		08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4B FOLLOWUP ASG REQD	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4C T. SPEC VIOLATION	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4D ADD'L REPORT REQD	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
4E PNSC/CSERB REQD	N	Y	08/13/07
Name :	LEONARD GRZECK II		

Request Attribute	Value	Reqd	Date
5 CLASSIFN/ASSIGNMNT		N	
Name :			

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Request Attribute	Value	Reqd	Date
5A CR VALID?	Y	Y	08/16/07
Name :	NANCY HOLLEY		

Request Attribute	Value	Reqd	Date
5B FURTHER INVN REQD	Y	Y	08/16/07
Name :	NANCY HOLLEY		

Request Attribute	Value	Reqd	Date
6 MISCELLANEOUS		N	
Name :			

Request Attribute	Value	Reqd	Date
6A COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6B COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6C COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6D COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6E COMMENTS		N	
Name :			

Request Attribute	Value	Reqd	Date
6F LAST COM ITM DUE			
Name :			

Request Attribute	Value	Reqd	Date
6G EQUIP PRI ISSUE		N	
Name :			

Request Attribute	Value	Reqd	Date
6H RESP MGR		N	
Name :			

Request Attribute	Value	Reqd	Date
6I EQUIP PRI STATUS		N	
Name :			

ACTION REQUEST APPROVAL REVIEW

ACTION REQUEST 00242461

Route List: 001			Route List Initiator: HINSOW			
Alert			Send	Send	Action	Action
PASSPORT	Fac	Group/Type	Last Name	Date	Time Taken	Date/Time
FERGUJ	BNP	ERCPSUPV	A FERGUSON	08/09/07	15:53 APPROVED	08/09/07 16:55
GORDYS	BNP	CONTROOM	A GORDY	08/09/07	16:55 APPROVED	08/10/07 04:38
GRZECL	BNP	REGREV	A GRZECK II	08/10/07	04:38 APPROVED	08/13/07 08:02
HOLLEN	BNP	UNITEVAL	A HOLLEY	08/13/07	08:02 APPROVED	08/16/07 10:03

TREND-CAUSE .

Facility: BNP Trend 1: EVENT Trend 2: EC Trend 3: EC4 Date: 08/16/07
Process: ENI Org: N/A Rank: Assign:
Description: CONTAMINATION IN CLEAN AREA

Keywords

Keyword	Keyword Description
ENVIR	OUTDOOR SPILLS, NPDES?STP, ENVIR. INDEX IMPACTS
REPEAT	REPEAT INCIDENT
CONTAM	CONTAMINATION
PIPING	PIPING
CHEMA	CHEMISTRY ANALYSIS

AR REFERENCE DOCUMENTS

DOC	SUB	DOCUMENT	REV	MIN	TITLE
TYP	TYP		OR		
BNP	AR	00242461	000		LOW LEVEL CONTAMINATION IDENT

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ASSIGNMENT NUMBER 15 SUB

Type : INVN Due Date : 09/06/07
Status : COMPLETE Reschedule : Pri Resp Group: ERCCSUPT
Assigned To : M MILLINOR Sec Resp Group:
Subject : CAT (CORRECT AND TREND INVESTIGATION)

Aff Facility: BNP Unit : System :
UCR : Schedule Ref :
Organization: Department : 284 Discipline :
Est Manhrs : Est Comp Date :

Assignment Status History

Updated Date	Updated By	Assign Status	Assign Due Date
08/09/07	HINSOW	INPROG	
08/16/07	HOLLEN		09/06/07
08/16/07	HOLLEN	ACC/PRI	
08/16/07	HOLLEN	NTFY/ASG	
08/23/07	MILLIMO2	ACC/ASG	
08/31/07	MILLIMO2	AWAIT/C	
08/31/07	HOLLEN	ACC/ASG	
08/31/07	MILLIMO2	AWAIT/C	
08/31/07	JOHNSJ03	ACC/ASG	
08/31/07	MILLIMO2	AWAIT/C	
09/04/07	HOLLEN	COMPLETE	

Assignment Attribute Value Reqd Date
BENEFIT REALIZED N
Name :

Assignment Attribute Value Reqd Date
EXTERNAL OE RECOMM N Y 08/31/07
Name : MICHAEL MILLINOR

Assignment Attribute Value Reqd Date
INTERNAL OE RECOMM N Y 08/31/07
Name : MICHAEL MILLINOR

Assignment Attribute Value Reqd Date
1 EVALUATOR/ASSIGNEE N
Name :

Assignment Attribute Value Reqd Date
IA COMMITTED N
Name :

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ASSIGNMENT NUMBER 16 SUB

Type : ENHN Due Date : 05/15/08
Status : COMPLETE Reschedule : 2 Pri Resp Group: ERCCSUPT
Assigned To : R MCGOWAN Sec Resp Group:
Subject : REVISE OE&RC-3101 TO INCLUDE A STEP TO ROUTE RESULTS OF

Aff Facility: BNP Unit : System :
UCR : Schedule Ref :
Organization: Department : BL6 Discipline :
Est Manhrs : Est Comp Date :

Assignment Status History

Updated Date	Updated By	Assign Status	Assign Due Date
08/09/07	HINSOW	INPROG	
09/04/07	HOLLEN		12/06/07
09/04/07	HOLLEN	ACC/PRI	
09/04/07	HOLLEN	NTFY/ASG	
11/28/07	HOLLEN		03/27/08
03/24/08	HOLLEN		05/15/08
04/28/08	MCGOWR	ACC/ASG	
04/28/08	MCGOWR	AWAIT/C	
04/28/08	HOLLEN	COMPLETE	

DITCH SAMPLES TO RC SUPERVISION FOR REVIEW.

Assignment Attribute Value Reqd Date
BENEFIT REALIZED N
Name :

Assignment Attribute Value Reqd Date
1 CHANGE BASIS EXTEND N 11/28/07
Name : JERRY JOHNSON JR.

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Revise OE&RC-3101 to include a step to route results of ditch samples to RC supervision for review.
Extend due date to 5/15/08 due to the U/1 refuel outage and other emergent assignments. This date is prior to the next sample period in May 2008.
The E&C Superintendent concurred with this request.

Assignment Attribute Value Reqd Date
2 COMMENTS N
Name :

COMPLETION NOTES

CAUSE/ACTION

ASSIGNMENT COMPLETION APPROVAL

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Route List: 001

Route List Initiator: MCGOWR

Alert	Send	Send	Action	Action
PASSPORT Fac Group/Type Last Name	Date	Time	Taken	Date/Time
JOHNSJ03 BNP ERCCSUPT A JOHNSON JR.	04/28/08	14:11	APPROVED	04/28/08 14:31
HOLLEN BNP ERCUEVAL A HOLLEY	04/28/08	14:31	APPROVED	04/28/08 15:26

ATTACHMENT 10
 Sheet 1 of 1
Adverse Condition Correct and Trend Form (CAT)
 Form CAP-NGGC-0200-10-17

Action Request Number: 242461

Investigator: Mike Millinor

1. Adverse Condition Description

Routine environmental soil/water sampling has identified low levels of tritium (approx. 600 pCi/L, Cs-137(2E-8 uci/gm), and Co-60 (5E-8 µCi/gm). This area receives runoff from the protected area through drainage pipes under the road. The main ditch is located inside a fenced area currently posted as a radiation area. This is a reoccurrence having been identified and addressed in NCR 98-01596.

This is a historical problem that has occurred prior to this incident as documented in AR 98-01596. The area was excavated in 1998 and contaminated soil removed. It is not necessary to re-excavate the area at this time as the contamination levels are very low and near the detectability limits. The area is fenced in and posted. The area is surveyed once per six months in accordance with OE&RC-3101. The area will continue to be monitored for any buildup of contamination in accordance with OR&RC-3101. As documented in AR 98-01596, the soil contamination is due to storm water run-off from inside the RCA which transports some loose soil particles from areas where contaminated materials were once stored. Since there are no pipes carrying contaminated plant process water in the vicinity, the tritium identified appears to be coming from airborne release washout. However, as an enhancement, OE&RC-3101 should be revised to include forwarding a copy of the results from the semiannual survey to Radiation Control Supervision in order maintain an awareness of contamination levels in the area. PRR 245066 has been initiated to include Radiation Control Supervision in the sample results review process.

2. Corrective Action Plan

	DESCRIPTION	CORRECTIVE ACTION	TYPE Specify (CORL OR ENHN)*	ASSIGNEE/ CONCURRENCE	DUE OR COMPLETION DATE
ADVERSE CONDITION	Contaminated soil was found in the ditch near F-Pad	Continue to monitor contamination levels in accordance with OE&RC-3101	CORL	Marty McGowan/Jerry Johnson	Complete/ongoing
OTHER	OE&RC-3101 needs to be revised to ensure RC Supervision is informed of sample results.	Revise OE&RC-3101 to include a step to route results of ditch samples to RC supervision for review.	ENHN	Marty McGowan/Jerry Johnson	12/6/07

* Designate which items are Long Term Corrective Action (requires approval by DSO – Manager PE&RAS for corporate).

AR242461 16

Revise E&RC-3101 to include a step to route results of ditch sample results to RC Supervision for review

OE&RC-3101 revision 27 is effective 4/28/08. Section 9.2.9.8, Soil Monitoring, includes a step to route the analysis results for these samples to RP Supervision for review.