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MARCHI, M. Wisconsin Public Service Corp.
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SUBJECT: Responds to NRC 970815 ltr re violations noted in insp rept
50-305/97-09. Corrective action: dose rates fuel transfer tube
shielded enclosure access gate to area was locked & posted
with sign "Caution High Radiation Area".

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NRC-97-84

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600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

August 15, 1997

10 CFR 2.201

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Reply to Notice of Violation, Inspection Report 97-009

Reference: Letter from J. A. Grobe (NRC) to M. L. Marchi (WPSC) dated July 16, 1997
(NRC Radiation Protection Inspection Report 50-305/97009 (DRS) and Notice
of Violation)

In the reference, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service Corporation (WPSC) with the results of NRC radiation protection inspection activities which were completed on June 20, 1997. During the inspection, NRC identified one Severity Level IV violation. The violation was cited for failure to conduct adequate radiation surveys that were necessary to comply with the requirements of 10 CFR 20.1902(b).

Attached is our response to the violation. If you have any questions with regard to this response, please contact me or a member of my staff.

Sincerely,

Mark L. Marchi
Manager - Nuclear Business Group

MTR

Attach.

9708220151 970815
PDR ADOCK 05000305
Q PDR

cc: US NRC Senior Resident Inspector
US NRC Region III



ATTACHMENT

Letter from M. L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

August 15, 1997

Re: Reply to Notice of Violation, Inspection Report 97-009

NRC Notice of Violation 97-009

10 CFR 20.1501 requires that each licensee make or cause to be made surveys that may be necessary for the licensee to comply with the regulations in Part 20 and that are reasonable under the circumstances to evaluate the extent of radiation levels, concentrations or quantities of radioactive materials, and the potential radiological hazards that could be present.

Pursuant to 10 CFR 20.1003, *survey* means an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation.

Contrary to the above, from October 8, 1996, to May 12, 1997, the licensee did not make surveys to assure compliance with 10 CFR 20.1902(b), which requires that each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation symbol and the words "CAUTION, HIGH RADIATION AREA" or "DANGER, HIGH RADIATION AREA". Specifically, the licensee failed to perform surveys following fuel movement to determine the radiological hazards which may be present in the transfer tube shielded enclosure.

WPSC Response

Wisconsin Public Service Corporation does not contest this violation. During the period of time the area was not posted, no entries were required to be made into the shielded enclosure and no personnel radiation exposures can be determined to have resulted from entries into the area while it was unposted. Therefore, there was no impact on personnel health and safety.

Discovery of this unposted High Radiation Area came as a result of WPSC's standing practice of having a Radiation Technologist accompany workers into areas within the RCA which are infrequently accessed or not routinely surveyed.

Reason For Violation

There were several reasons why surveys were not performed within the shielded enclosure surrounding the spent fuel transfer tube:

1. The procedure governing restoration of the area had no requirement for Radiation Protection (RP) to be notified or to take specific actions after fuel movement had been completed. This was due to an oversight which occurred several years ago during revision of the KNPP Refueling Procedure, RF 1.0. Changes should have been made at that time to actively involve the RP Group in locking, unlocking, surveying and appropriately posting the gate at the fuel transfer tube shielded enclosure in light of the revised 10 CFR 20 requirements regarding control of Very High Radiation Areas.
2. RP did not question the need for an immediate survey of the shielded enclosure after fuel movement was completed. This may have been caused by the fact that until 1995, this area had had no lockable gate of its own; and that never before in the history of plant, fuel movement excepted, has this area ever been required to be posted for radiation protection purposes.
3. RP failed to evaluate the need to survey the fuel transfer tube even though the number of hot particles seen during decontamination of the refueling cavity was higher than past refuelings. In hindsight, a survey of the area would have been reasonable under the circumstances to assess the potential radiation levels that could be present following the completion of fuel movement.

Corrective Actions

Immediately upon discovery of the dose rates in the fuel transfer tube shielded enclosure, the access gate to the area was locked and posted with a sign bearing the radiation symbol and the words "Caution, High Radiation Area". An investigation was performed to identify whether any individual had entered the area and received a dose during the period of time the area was unlocked and unposted. Results of that investigation revealed no unexpected doses that could be attributed to entries into the area, and that, in all probability, there were no entries during that period. The shielded enclosure is located in a fairly remote and inaccessible location. It is not an area easily accessed by personnel and no work was scheduled in or near the area during the time period in question.

This Notice of Violation and the Inspection Report details have been made required reading for each member of the Radiation Protection Group and an overview of the event has been presented to Radiation Protection Technologists as part of the Continuing Training program. The Notice Of Violation has been posted for all plant staff to read.

Long term corrective actions to prevent similar events from occurring involve revising the KNPP Refueling Procedure, RF 1.0, to include:

1. An RP signoff for locking and posting the shielded enclosure access gate as a Very High Radiation Area prior to commencing fuel movement,
2. An RP signoff for locking and posting both access gates to the Shield Building Annulus with High Radiation Area signs prior to commencing fuel movement,

3. An RP signoff for unlocking, surveying and appropriately posting both Shield Building Annulus gates following fuel movement, and
4. An RP signoff for unlocking, surveying and appropriately posting the fuel transfer tube shielded enclosure area after fuel movement is complete.

Compliance Schedule

All short-term corrective actions have been completed. Long-term corrective actions will be complete by December 31, 1997. Future fuel movement activities are not expected to occur until the next scheduled refueling outage, currently planned for the fall of 1998.