

Appendix B

NOTICE OF VIOLATION

Iowa Electric Light and
Power Company

Docket No. 50-331

As a result of the Health Physics Appraisal conducted November 10-21, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

1. 10 CFR 20.203(c)(2) lists three alternative requirements for controlling access to high radiation areas.

Contrary to these requirements:

- a. An unposted, unbarricaded, and unobserved high radiation area existed near the seal well drain pipe on the 812-foot level of the reactor building for several days during the appraisal. (Section 5.4)
- b. The north door to the air ejector room (posted as a high radiation area) was found open and unattended. (Section 5.4)

This is a Severity Level IV violation (Supplement IV).

2. Technical Specification 6.9.1 requires adherence to radiation protection procedures. The following instances of failure to meet this requirement were identified during the appraisal.

- a. Procedure RPP 5.1, Section 3.2.2. requires that only those certified by the radiation protection engineer may authorize radiation work permits (RWPs).

Contrary to the above, an uncertified contract radiation protection technician had approved several RWPs. (Section 5.2)

- b. Procedure RPP 5.1, Section 3.3.3 specifies that personnel will not knowingly deviate from conditions as stated on the RWP without authorization.

Contrary to the above, on five different occasions appraisal team members observed noncompliance with the protective equipment requirements of RWPs. (Section 5.2)

- c. Procedure RPP 6.2, Section 3.2.2.2 requires contaminated areas to be barricaded or roped off and conspicuously posted with access controlled by at least one step-off pad.

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Contrary to the above, appraisal team members observed several unposted and improperly posted contaminated areas, and observed several posted contamination areas that did not contain step-off pads. (Section 5.4)

- d. Procedure RPP 6.2, Section 3.2.2.1 requires barricading and posting of areas containing radiation levels exceeding 2.5 mrem/hr.

Contrary to the above, appraisal team members identified several unposted areas containing radiation levels exceeding 2.5 mrem/hr. (Section 5.4)

- e. Procedure PPIP 7, "Emergency Assignment Board Tag Duties" identifies need for seven high range and one low range portable survey meters to meet emergency response team requirements.

Contrary to the above, at no time during the appraisal were sufficient quantities of functional instruments available in the emergency kits and at access control to meet the requirement. (Section 6.1)

- f. Procedure RPP 7.1, Sections 3.1 and 3.2 require daily performance of portable survey instrument source checks.

Contrary to the above, source checks were not routinely performed during the appraisal, and licensee personnel indicated that performance of such checks is rare. (Section 6.1)

- g. Procedure RPP 7.1, Section 3.1 requires that malfunctioning portable survey instruments be tagged and returned to access control.

Contrary to the above, licensee personnel identified to the appraisal team a substantial number of malfunctioning portable survey instruments that were not tagged. (Section 6.1)

This is a Severity Level V violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

February 2, 1981
Dated

James G. Keppler
James G. Keppler
Director, Region III