

MAY 23 1980

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-206/80-13

Docket No. 50-206 License No. DPR-13 Safeguards Group

Licensee: Southern California Edison Company
P. O. Box 8001
2244 Walnut Grove Avenue
Rosemead, California 91770

Facility Name: San Onofre Nuclear Generating Station - Unit 1

Inspection at: San Diego and Camp Pendleton, California

Inspection conducted: April 23-25, 1980

Inspectors: P. Joukoff, Investigator MAY 22, 1980
H. S. North, Radiation Specialist May 16, 1980
 Date Signed
 Date Signed

Approved by: F. Wenslawski May 22, 1980
F. Wenslawski, Chief Reactor Radiation Date Signed
Safety Section

Approved by: H. E. Book 5/23/80
H. E. Book, Chief, Fuel Facilities and Materials Date Signed
Safety Branch

Summary:

Investigation on April 23-25, 1980 (Report 50-206/80-13)

Areas Inspected: An allegor was interviewed at an offsite location and nine specific allegations were examined at the licensees facilities. The inspection involved 26 inspector hours onsite by two inspectors.

Results: The inspector observed a failure to follow a Radiation Protection Procedure which is required by Technical Specification 6.8.

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DETAILS

1. Persons Contacted

Southern California Edison Company (SCE)

R. Dietch, Vice President, Nuclear Engineering and Operations
*J. Curran, Plant Manager, San Onofre Nuclear Generating Station (SONGS)
*R. Brunet, Superintendent, SONGS, Unit 1
*D. Nunn, Manager, Quality Assurance
*M. Sullivan, Supervisor of Chemistry and Radiation Protection, SONGS-1
*G. McDonald, QA-QC Supervisor
J. Mortenson, Chemistry and Radiation Protection Engineer (Night Shift Supervisor, Chemistry and Radiation Protection)
E. Bennet, Foreman, Chemistry and Radiation Protection

Several Chemistry and Radiation Protection Technicians and members of the Security Staff.

Various escorts and Bechtel craft workers.

*Designates those individuals present at the exit interview conducted on April 25, 1980.

Bechtel Power Corporation (BECHTEL)

G. Kleppe, Construction Superintendent
G. Booth, Labor Relations Representative
W. Young, Building Trades Representative
P. Pursehouse, General Foreman - Electrical
D. Spelts, Electrical Foreman
L. Rosa, Electrician - Journeyman
M. Kahle, Lead Timekeeper

Alleger

M. Flanagan, Electrician, "Inside Wireman", former employee of Bechtel Power Corporation

NRC

R. Pate, Resident Inspector, SONGS, Units 2-3
L. Miller, Resident Inspector, SONGS, Unit 1

2. Receipt of Allegations by NRC

On April 21, 1980, R. Pate, resident inspector, Units 2 & 3, was telephoned by Flanagan who made a series of allegations concerning poor radiation protection practices in Unit 1. Based on the allegations, Pate prepared a summary which he gave to L. Miller, resident inspector Unit 1, since it concerned Unit 1. The NRC Region V office was informed of the allegations by the resident inspector. The same day Flanagan also telephone the NRC

Region V office in Walnut Creek, California after normal working hours (7:30 AM - 4:15 PM). Flanagan's call to the Regional office was automatically diverted to the NRC Headquarters duty officer. Customarily the HQ Duty Officer telephones the Regional Duty Officer promptly to pass on information received from diverted calls.

The Region V, Duty Officer Log Book, Volume II, 10/15/79 to (undated), notes that at 5:55 PM on April 21, 1980, a call was received from the HQ Duty Officer concerning an inquiry from a reporter at The San Diego Union newspaper. The reporter said that allegations had been made to Miller and that he wanted information for a story for the April 22, 1980 morning paper. The Region V Duty Officer informed the HQ Duty Officer that the Region V office was aware of the allegations made to the resident inspector and that Region V would look into the matter but planned no action that night.

At 7:30 PM on April 21, 1980, the HQ Duty Officer again telephone the Region V Duty Officer to report the receipt of a telephone call from Flanagan who had made numerous allegations concerning the radiation safety program at San Onofre. The HQ Duty officer was informed that the Region was aware of the allegations, that the alleged was in contact with the resident inspector, had the alleged's name and telephone number and that the Region intended to, "look into this matter".

On April 22, Flanagan's allegations, summarized by Pate during the April 21 telephone conversation, were dictated to the Region V office. (Annex A). Repeated attempts were made to reach Flanagan by telephone to arrange an appointment for the following day. Prior to reaching Flanagan a call was received at Region V from C. Smith, a reporter with The San Diego Union newspaper. Smith wished comments on a list of allegations which he stated he had received from a confidential informant. Comment was declined on the basis of protecting Flanagan's identity and because no inquiry into the allegations had been conducted at that time. Subsequently an appointment for an interview on the morning of April 23 was made with Flanagan.

3. Interview with Flanagan

Two NRC personnel, an inspector and an investigator, interviewed Flanagan at his residence in San Diego, California from 9:30 AM to 1:30 PM on April 23. Mrs. Flanagan was present during the interview. The starting point for the interview was the list of allegations (Annex A). Flanagan was informed that the NRC would protect his identity within the limit of the law but that this protection was limited and was not as complete as that afforded in attorney-client relationships. At the time this assurance was given to Flanagan neither he nor the NRC personnel had seen the story in the April 23, 1980 issue of The San Diego Union newspaper.

Flanagan stated that item 9 on the list of allegations should be deleted since he had been informed by the NRC Resident Inspector that no requirement existed for the issuance of personnel monitoring devices if an individual was not required to enter an area where radiological controls were in effect. He stated that he had mailed a copy of the allegations, which he had prepared, to the NRC Resident Inspector and that he had deleted that item from the list.

Flanagan stated that he was an electrician, specifically "inside wireman", and that he had been most recently employed by Bechtel Power Corporation, P. O. Box 60860 - Terminal Annex, Los Angeles, California 90060, to work at SONGS-Unit 1. He stated that his employment began on April 16, 1980 and ended April 19, 1980 when he voluntarily left the SONGS-1 site in mid shift because he "felt it was hazardous to his health."

Flanagan stated that he had previously worked at SONGS-Units 2-3 from June 1979 to January 1980. He stated that between the two periods of work at the SONGS sites he had worked in town at unspecified locations.

Flanagan stated that he had no previous experience in working at operating nuclear power plants and that he had received no training concerning nuclear power or radiation protection prior to his work at SONGS.

Flanagan stated his belief in nuclear power and presented a publication of his union and called attention to a pronuclear article. He stated that he had been favorably impressed by the safety practices which he had observed during his employment at SONGS 2&3. He said that his concerns had resulted in part from an apparent lessened concern for safety at SONGS-1 when compared with SONGS 2&3. He specifically noted that the use of "hard hats" was mandatory and strictly enforced at SONGS 2&3 but was not at SONGS-1. (Inspectors Comment: It should be noted that many operating nuclear power plants do not require the use of "hard hats" in areas where radiological controls are in effect. A significant difference exists between plants under construction and in operation with respect to hazards from falling objects. "Hard hats" can interfere with the proper use of protective or anti contamination clothing ("Anti Cs") or respiratory protective equipment.)

Flanagan stated that when he arrived at SONGS-1 he received no formal training. He said that within two or three hours he was in the plant working. The only training he received was that provided by his escort. The training included self monitoring for contamination with a G-M frisker and "Anti C" dressing and undressing. Flanagan said that his escort was good and had provided good instruction and was attentive in directing the activities of the group to which he was assigned. Flanagan said other escorts were not as good or attentive. (Inspector comment: SCE has used the escort concept in controlling the large numbers of craft or specialized worker brought onsite during outages. The escorts for the outage taking place when Flanagan was onsite were temporary security personnel from a private security service. The escorts receive three days of training in radiation protection practices, plant procedures and plant familiarization. The escorts are assigned to specific work groups or workers and remain with the assigned workers. The escorts are expected to provide specific training and surveillance for radiation protection purposes.)

Flanagan said that as he worked he became increasingly concerned by his lack of training and that he wanted more training. On Friday April 19 he and a group of electricians met with their foreman and asked for more training. On Saturday, April 20, a meeting was scheduled at which a representative of the SONGS-1 staff was to talk to a group of electricians. Flanagan said that a similar meeting had been held on the preceeding night shift. He said he was told by this Foreman that there had been a lot of trouble (questions) during the night shift meeting and that Flanagan and one of his coworkers, individual "A", were to "keep a low profile".

Flanagan said that he talked to various workmen during the morning and that when the morning meeting began at 10:30 AM from 100 to 250 workmen were present. Flanagan said that the person, he didn't know who it was (E. Bennet, Foreman Chemistry and Radiation Protection) talked about frisking clean clothes, mrems from the sun (exposure from natural sources), X-ray and some dressing (proper use of "Anti Cs"). The meeting broke up at 11:30 AM, the beginning of the lunch break and was to continue after lunch. As the meeting was breaking up Flanagan gave his foreman a piece of paper and was quoted as having said, "I've had enough of this (deleted) you can send my check to this address". Flanagan stated that he and one of his coworkers, individual "A", voluntarily left the site.

Flanagan said that his union hiring hall again assigned him to SONGS-1 on April 22, and that he had decided to return to work at SONGS-1. He said that both he and individual "A" were told to return for the morning shift on April 22. Flanagan said that he had an appointment during the day on the 22nd and he was therefore scheduled for the 5:00 PM - 3:00 AM shift that day. He said he arrived half an hour early for escort assignment on the evening shift. On the night of April 22 there were ten new hires of which Flanagan was one. Flanagan said that when the Bechtel general foreman approached the group of new hires the foreman said "Ten new men were cleared for night shift except for a guy named Flanagan." This comment was overheard by at least two other workers according to Flanagan.

Flanagan said that Bechtel had a two hour, "show up time", check prepared and waiting for him and after receiving the check he left the site.

The NRC personnel discussed the specific allegations in Annex A with Flanagan in an attempt to obtain specific information (e.g. names, dates, locations) on which to base the subsequent investigation at SONGS-1. After detailed discussions certain changes in the original list of allegations were made by Flanagan. In addition the Bechtel general foreman's specific identification of Flanagan by name on April 22, when he returned to the SONGS-1 site, appeared to involve a possible violation of 10 CFR 19.16 Requests by workers for inspections. Section (c) of this regulation states in part "No licensee shall discharge or in any manner discriminate against any worker because such worker has filed any

complaint or instituted or caused to be instituted any proceeding under the regulations in this chapter or because of the exercise by such worker on behalf of himself or others of any option afforded by this part." This section of the regulations was discussed with Flanagan by the NRC personnel and an additional allegation was added to the corrected list by Flanagan. (Annex B)

A formal statement of allegations was prepared by the NRC investigator, read and each paragraph and page initialled by Flanagan and the last page signed by Flanagan and the NRC inspector and investigator. (Annex C)

4. Onsite Investigation

The investigation team arrived at the NRC resident inspectors office at SONGS at approximately 4:00 PM, April 23. Copies of the allegations (Annex B) were prepared in which Flanagan's name was deleted, in keeping with the prior agreement to protect his identity. Copies were required to present to SONGS-1 management at the commencement of the investigation as required by 10 CFR 19.16(a) Requests by workers for inspections. It was at this time that the investigation team first became aware of the story in the April 23 issue of The San Diego Union (Annex D).

The investigation team was unable to contact SONGS-1 management personnel at the site on the afternoon of April 23 and the onsite inspection did not begin until April 24.

On the evening of April 23, Flanagan was contacted by telephone. He was informed of the article in The San Diego Union. He stated that he had seen the article. It was explained that any attempt on the part of NRC to protect his identity at this point would be futile. Flanagan agreed and released the NRC from the commitment to protect his identity by a statement to that effect to the inspector and investigator separately.

The investigation began on the morning of April 24, with a meeting with Dietch, Curran and Brunet of SCE and the investigation team. The licensees representatives were provided with a copy of the allegations (Annex B).

The investigator immediately began an inquiry into the allegation of discrimination. The inspector meanwhile satisfied the site security requirements for badging for unrestricted access to all plant areas.

With the exception of the allegation of discrimination the allegations were generally nonspecific and involved possible procedural violations by unidentified individuals. The investigator examining the discrimination allegation completed his work on the evening of April 24 and went to another assignment. The inspector observed work and radiological control practices and informally interviewed licensee personnel and Bechtel craft workers on the afternoon of April 23 until 4:30 PM, and again from 11:00 PM until 2:30 AM, April 24, and from 10:00 AM until 3:00 PM on April 24.

In support of the work place observation and interviews a number of pertinent licensee procedures were examined:

<u>Procedure Number</u>	<u>Title</u>
S-VII-1.5	Access to Controlled and Exclusion Areas
S-VII-1.8	Decontamination Procedure-Personnel
S-VII-1.9	Decontamination and Clearance of Tools, Equipment and Areas
S-VII-1.13	Determination of Radioactive Surface Contamination by Smear Surveys
S-VII-1.34	Radiation Survey Procedure
S-VII-1.40	Portal Monitor Operational Check
S-VII-1.43	Protective Clothing Requirements for Work on Reactor Components
S-VII-1.45	Qualified Escort Training
S-IV-1.12	Duties and Obligations of Members of the Security Organizations

5. Findings

Allegation

- "1. Improper disrobing, i.e., not taking clothes off in the right order. I saw one guy frisk his glove - take off the outer set, then the inner set, then with his bare hand remove his shoe covers."

No instances of improper disrobing were observed which would have led to transfer of contamination to the hands or shoes. Some confusion and clumsiness was observed in the proper sequence of removal of the normally used two pairs of gloves (inner cotton, outer plastic examination) and two pairs of shoe covers (inner plastic booties, outer rubber overshoes) and the use of the GM friskers at the step off pads. On no occasion was anyone observed removing outer shoe covers with his bare hand(s).

No items of noncompliance or deviations were identified.

Allegation

- "2. Laborers entering the controlled area did not have a hard hat on. One of them was smoking. Not clothed properly, then left area improperly."

"Hard hats" were not routinely used or required on the SONGS-1 site. SCE has established three security perimeters with respect to SONGS-1, an outer perimeter fence surrounds the Owner Controlled Area, a second security fence surrounds the Protected Area. Additional barriers within the protected area control access to the Vital Areas. Additional areas within the vital and protected areas may be designated as radiological control areas. Persons entering the radiological

control areas routinely did not wear "hard hats". Radiation Protection Procedure S-VII-1.43, specifically designates minimum clothing requirements. "Hard hats" are not included in the list of required clothing.

No instances of smoking, chewing (gum or tobacco), eating or drinking were observed in areas where radiological controls were in effect. The licensee had established two areas adjacent to radiological control areas where workmen could obtain drinking water and were permitted to smoke.

No instances of improperly clothed individuals or leaving radiologically controlled areas without frisking were noted. It is noted that variations in protective clothing were noted however the variations were logical and not based on whim or personnel preference. Generally three types of protective clothing ("Anti Cs") were observed. Workmen, dressed in SCE supplied underwear, socks, cloth coveralls, head coverings (cloth hoods or surgeons caps), cotton and examination gloves. Engineering or supervisory personnel in the area generally wore cloth coveralls over street clothes, head coverings and two sets of gloves. SONGS-1 plant personnel in the area on specific tasks of short duration, which did not require entry past a step off pad, wore lab coats, and two pairs of gloves. Radiation Protection Procedure S-VII-1.5 notes: "G. Protective clothing --- 3. Coveralls or lab coats may be worn over personal clothing when job conditions permit.

No items of noncompliance or deviations were identified.

Allegation

- "3. Men leaving the restricted area were not disrobing properly and were not using friskers but they stepped over the radiation boundary rope instead."

For observations concerning disrobing see Allegation 1 in this section. The inspector observed no instances where anyone failed to use the friskers or stepped over the radiation boundary rope. Discussions with workmen established that stepping over the boundary rope had occurred, however, this breakdown in procedures was apparently due more to a lack of knowledge of requirements than a deliberate violation of procedures. The location where the alleged violation of boundary control occurred was located on the SONGS-1 turbine deck, where a step off pad was in use at the access control point. On leaving the area procedures required the use of two separate frisker stations. The required sequence of use of the two frisker stations was the use of the first frisker during the removal of rubbers, booties and two pairs of gloves. The second frisker station was to be used for confirmatory frisking after leaving the first station. The space between the first and second frisker stations was separated from the outer, non step off pad controlled area by a low rope. The alleged failures

occurred after leaving the first frisker station. It is noted that if an individual were to have departed from the plant after stepping over the rope he would have been required to pass the following monitoring and frisker stations on leaving the plant: Contractor personnel pass two frisker stations in the clothing change trailer and a portal monitor and frisker station at the point of security control for the protected area. SCE personnel pass a frisker and portal monitor in the radiation protection change area and a portal monitor at the security exit from the protected area.

No items of noncompliance or deviations were identified.

Allegation

- "4. Smoking and drinking water was observed in an unauthorized area outside of the area set aside for smoking and drinking. Core drillers were observed on one roof inside the controlled area both without the proper clothing and one of them was smoking."

As previously noted in connection with allegation 2 no instances of violations of the smoking and drinking water rules in radiological controlled areas were observed.

With respect to the core drillers who were improperly dressed and smoking. Certain TMI Lessons Learned back fit work required drilling holes in the roof of the control building. This building houses the control room, laboratories, offices and on the lower floor the radiation protection access control point. When the work began access to the roof of the control building was through, "door 16", the radiation protection access control point, up the stairs toward the turbine deck and up a ladder located near the safety valve discharges on the north side of the control building. The roof of the control building is not and has not been a part of the radiological controlled area nor did the core drilling involve radioactive materials or contaminated systems, however because of the point of entry the workmen were required to don "Anti C's" because the entry to the work area was through an area in which radiological controls were in effect. These individuals also were provided half mask respirators because of the possible dust generated by their work. Subsequently it was found that a ladder could be positioned on the south side of the control building which would give access to the roof from an area on the turbine deck level where radiological controls were not in effect. Consequently workmen could have been observed wearing "Anti Cs" and later in street clothes and smoking in the same area giving the impression of a break down in controls.

No items of noncompliance or deviations were identified.

Allegation

- "5. Some personnel did not remove their protective gloves in the smoking and drinking area. One person wearing two pairs of gloves did not remove his before smoking. A black, thin guy who works in rad waste carried cigarettes in the outer pocket of his coveralls on April 17 or 18."

On April 25 the inspector observed two workmen smoking in the turbine deck, drinking water-smoking area. One man was wearing cotton liner gloves, the other man was wearing cotton liner gloves and green examination gloves. Smoking without removing gloves and monitoring hands is contrary to Radiation Protection Procedure S-VII-1.5 Access to Controlled and Exclusion Areas. The procedure states, "III. Procedure --- H. Smoking, Drinking Water Areas, 1. Smoking and drinking water areas may be established in the Controlled Area. These areas will be posted and drinking water dispensers will be provided. Plastic and other gloves must be removed and hands must be monitored before smoking or drinking."

The inspector observed no one carrying any cigarettes, gum, chewing tobacco or similiar materials in outer pockets of "Anti C" coveralls.

Allegation

- "6. Personnel were observed not using friskers on clean clothes prior to donning to insure that the clean protective clothes were clean."

The inspector observed that some personnel failed to monitor (frisk) clean "Anti Cs" prior to dressing. Discussions with licensee personnel established that the practice of frisking clean "Anti C's" is recommended but not required. Procedure S-VIII-1.5, III. G. Protective Clothing, states in part, "2. Clean protective clothing may be taken to the shower and locker rooms for dressing prior to work. It is good practice to monitor this clean clothing before use." The fact that Flanagan was aware of this recommended practice indicates that his escort had properly instructed him in this particular area and that Flanagan had been attentive to the instructions. (Inspectors comment: The "Anti C's" used at SONGS-1 are laundered by a firm specializing in supplying clean "Anti C's" to the nuclear industry. Some nuclear power plants operates their own laundry facilities and monitor the "Anti C's" after laundry. Post laundry monitoring is performed by commercial suppliers of clean "Anti C's" however, some nuclear power plants using commercially supplied "Anti C's" repeat or encourage the monitoring of clean garments as an added protective measure.)

No items of noncompliance or deviations were identified.

Allegation

- "7. At the south end of the gantry crane, a boundary rope was set up around contaminated material. The material included scaffolding, pipes, poles, clamps, and lossly (sic) stacked stuff. Some of the material extended beyond the boundary rope."

This condition had been identified by the NRC resident inspector who had requested that the licensee conduct a survey, including smears, of the material extending beyond the boundary rope.

The survey established that while some of the material surrounded by the boundary rope was in fact contaminated none of the contaminated material extended beyond the boundary rope. Discussions with licensee personnel established that "real estate" constituted a significant problem during refueling. In this context the term "real estate" was used to describe available surface area in which to store various materials and equipment. At the time of the inspection the number of personnel at SONGS-1 had expanded from approximately 250 to about 900, the turbine had been disassembled, equipment for inservice inspection of the primary system was on the turbine deck and work was underway on the Lessons Learned back fit and routine maintenance. With the large number of people onsite and the competition for "real estate", the radiation protection staff had experienced problems with the unauthorized relocation of barriers established by the radiation protection staff. The subject had been discussed in a management meeting with resulting instructions to all personnel that such boundaries were not to be moved without the express approval of the radiation protection staff.

No items of noncompliance or deviations were identified.

Allegation

- "8. On April 16 to 18, hand and foot monitors were broken or not in operation. When the guard at the monitor was asked why the monitor was not working, they said "I don't know, I think the circuit is turned off." These friskers are at the south end where most of the workers go in and out of the protected area. The final monitors leaving plant."

The inspector questioned security personnel at the exit from the Protected Area concerning this allegation. The guards stated that they had not been assigned this duty during the time in question but that it was their understanding that the portal monitors had malfunctioned at some prior time. They called attention to the GM friskers located near the portal

monitor as a backup means of monitoring. At the time of the discussion with the guards they commented that the portal monitor had just moments before spuriously alarmed, which they had reported. An instrument technician arrived to check the portal monitor while the inspector was talking to the guards. It should be noted that while the portal monitor and frisker at this location are the last personnel monitoring locations prior to leaving the plant a number of other monitoring stations exist. One frisker is located at the exit from the auxiliary building and two friskers at the containment area step off pad. Bechtel workers have two frisker stations at the change trailer and a portal monitor and frisker at the exit from the protected area.

SCE personnel have a frisker and portal monitor in the radiation protection access control point and a portal monitor at the exit from the protected area.

Licensee personnel stated to the inspector that non plant personnel were impatient with the friskers and much preferred the portal monitors. The use of a frisker is very time consuming compared to a portal monitor which requires only a few seconds.

No items of noncompliance or deviations were identified.

Allegation

- "9. I was discriminated against by Bechtel Power Corp., on 4/22/80. A General Foreman approached myself and two other new hires (electricians). He said "Ten new men were cleared for night shift except for a guy named * _____. I said "I am * _____. He said I would not be able to enter. The steward, Wes Young, arrived and told me that "your check is waiting for you. At least I got you two hours show up time".

The investigator individually interviewed the SONGS-1 construction superintendent, the Bechtel labor relations representative, the onsite union - crafts representative, as well as several electrical crew foreman and workers concerning the discrimination allegation.

Of the individuals interviewed, four were actually present when Flanagan and individual "A" voluntarily walked off the jobsite during a radiation health meeting on April 19, 1980. In addition, these individuals stated that approximately 100-150 persons were present when the incident occurred.

During the investigation the investigator was informed by Bechtel management personnel that the corporation has a rule stating that any worker who quits a job voluntarily cannot be rehired for a period of 60 days. All craft workers interviewed and questioned about this rule were aware of its existence although some were not familiar with the rehire time period.

Through the interviews it was established that on April 22, 1980 Flanagan was not allowed on the job site for the swing shift due to this Bechtel Rule. In addition, Bechtel had a two hour "show up" check ready for Flanagan since they had been informed by individual "A", who had answered the day shift call from the union hall, that Flanagan would be coming out for swing shift. It should be noted that individual "A" was also denied site entry and was paid two hours "show up" time pursuant to this same Bechtel rule.

During the course of this investigation it was suggested to Bechtel Management personnel contacted that a system be initiated to inform union members being sent to the site, by their respective union halls, that their work may involve entry into radiological areas. Bechtel management agreed to pursue the implementation of such a system. Other information regarding radiological control practices obtained through the interviews with craft workers was relayed to the inspector for incorporation in the onsite investigation.

Based upon the investigation it appears that Flanagan voluntarily left his job at SONGS-1 was not allowed to return because of due to the noted Bechtel Corporation rule. This incident does not appear to be contrary to the requirements of 10 CFR 19.16(c), Requests By Workers for Inspections.

During tours of the radiological work areas and informal interviews with workers, the inspector questioned Bechtel workers on any penalties imposed on workmen who voluntarily leave work during a shift without permission. Those persons questioned stated that Bechtel had a list of rules, some said as many as 24, that they couldn't quote them but that first one was a prohibition against theft. Several said that the Bechtel general foreman would have a copy of the list. All those individual questioned agreed that if a worker left a job during the shift without permission he would not be rehired by Bechtel for some time period. The time varied between 30 and 90 days.

6. Exit Interview

At the conclusion of the inspection on April 25, 1980 the inspector met with those individuals identified in paragraph 1 of this report. Prior to the commencement of the meeting Brunet gave the inspector copies of three memoranda prepared by the licensee.

The first, dated April 25, 1980, was addressed to H. L. Ottoson, Manager of Nuclear Operations, SCE. The memorandum repeated the allegations identified in Annex B. The memorandum continued and included the statement that, "---it is evident to us that questionable radiation protection practices have occurred and we have taken the following actions:."

The specific actions taken were:

1. A condensed radiation protection lecture had been developed and would be presented to all new hires entering the plant;
2. Copies of the allegations were distributed to department heads for discussion with employees with emphasis on observing and reporting irregular radiation protection practices;
3. Escorts provided by the private security service had been instructed to provide more stringent control over the radiation protection practices of individuals they escort; and
4. observers were being provided at access points to areas where step off pads are used to assure that proper protective measures are followed.

The other two memoranda were a notice to supervisors concerning the assignment of step off pad observers and the second a notice to Bechtel management that a short radiation protection course would be required for all personnel employed on the San Onofre Project.

The inspector summarized the results of the inspection briefly and informed the licensee's representatives that while certain of the allegations were probably true, evidence supporting the allegations was not observed by the inspector.

The licensee was informed that two workmen had been observed smoking while wearing gloves contrary to Radiation Protection Procedure S-VII-1.5 Access to Controlled and Exclusion Areas. This failure to follow procedures appeared to constitute noncompliance with Technical Specification section 6.8 Procedures, in that the identified procedure was not implemented as required by paragraph 6.8.1 (80-13-01).

The alleged stated at 7:45 AM on April 22, 1980, the following were conditions that he personally witnessed:

1. Improper disrobing, i.e., not taking clothes off in the right order. I saw one guy (Tom, an electrician) frisk his glove - take off the outer set, then the inner set, then with his bare hand removed his shoe covers.
2. Laborers entering the controlled area did not have a hard hat on. One of them was smoking.
3. Men leaving the controlled area were not disrobing properly and were not using friskers but they stepped over the radiation boundary rope instead.
4. Smoking and drinking water was observed in an unauthorized area outside of the area set aside for smoking and drinking. Core drillers were observed on one roof inside the controlled area both without the proper clothing and one of them was smoking.
5. Some personnel did not remove their protective gloves in the smoking and drinking area. One person wearing two pairs of gloves did not remove his before smoking. A black, thin guy who works in rad waste carried cigarettes in the outer pocket of his coveralls on April 17 or 18.
6. Personnel were observed not using friskers on clean clothes prior to donning to insure that the clean protective clothes were clean.
7. At the south end of the gantry crane, a boundary rope was set up around contaminated material. The material included scaffolding, pipes, poles, clamps, and lossly stacked stuff. Some of the material extended beyond the boundary rope.
8. On April 16 to 18, hand and foot monitors were broken or not in operation. When the guard at the monitor was asked why the monitor was not working, they said "I don't know, I think the circuit is turned off." These friskers are at the south end where most of the workers go in and out of the controlled area.
9. An electrician was not given a film badge on April 15 or 16, and he was angry about it, however, he never did go into the controlled area.

That's the end of the allegations.

Al Miller Note: The alleged has stated that he will mail a written copy of these allegations to the resident office and if he does, the Regional Office will be immediately provided a copy of them.

1. Improper disrobing, i.e., not taking clothes off in the right order. I saw one guy frisk his glove - take off the outer set, then the inner set, then with his bare hand remove his shoe covers.
2. Laborers entering the controlled area did not have a hard hat on. One of them was smoking. Not clothed properly, then left area improperly.
3. Men leaving the restricted area were not disrobing properly and were not using friskers but they stepped over the radiation boundary rope instead.
4. Smoking and drinking water was observed in an unauthorized area outside of the area set aside for smoking and drinking. Core drillers were observed on one roof inside the controlled area both without the proper clothing and one of them was smoking.
5. Some personnel did not remove their protective gloves in the smoking and drinking area. One person wearing two pairs of gloves did not remove his before smoking. A black, thin guy who works in rad waste carried cigarettes in the outer pocket of his coveralls on April 17 or 18.
6. Personnel were observed not using friskers on clean clothes prior to donning to insure that the clean protective clothes were clean.
7. At the south end of the gantry crane, a boundary rope was set up around contaminated material. The material included scaffolding, pipes, poles, clamps, and lossly stacked stuff. Some of the material extended beyond the boundary rope.
8. On April 16 to 18, hand and foot monitors were broken or not in operation. When the guard at the monitor was asked why the monitor was not working, they said "I don't know, I think the circuit is turned off." These friskers are at the south end where most of the workers go in and out of the protected area. The final monitors leaving plant.
9. I was discriminated against by Bechtel Power Corp., on 4/22/80. A General Foreman approached myself and two other new hires (electricians). He said "Ten new men were cleared for night shift except for a guy named * ". I said "I am * ". He said I would not be able to enter. The steward, Wes Young, arrived and told me that "Your check is waiting for you. At least I got you two hours show up time".

*Name deleted.

True copy of allegation with the exception of the deletion of two names.

(Location Deleted)

23 April 1980

9:45 AM

I, Michael Wayne Flanagan, who was born on (deleted), am currently residing at (Address Deleted), San Diego, California, do voluntarily make the following statement to Harry S. North, Radiation Specialist, and Philip V. Joukoff, investigator, both of whom are with Region V, United States Nuclear Regulatory Commission. No threats, promises, or duress were made to me to make this statement. I give this statement of my own free will. I understand this statement might be used in a legal proceeding and will become part of a public record.

I was employed at Southern California Edison, San Onofre Nuclear Generation Station, Unit 1, from April 16, 1980 to April 20, 1980 as a electrician and left as a result of a lack in safety procedures. I was again sent to the same job site on April 22, 1980 by the International Brotherhood of Electrical Workers Union, Local 569, but was denied entry to the job site by a Bechtel Power Corporation General Foreman.

I have observed the following conditions which I feel are unsafe;

1. Improper disrobing, i.e. not taking off clothes in the right order. I saw one worker frisk his glove - take off the outer set, then the inner set, then with his bare hand remove his shoe covers.
2. Laborers entering the controlled area did not have a hard hat on. One of them was smoking, not clothed properly, and left the area improperly.
3. Men leaving the restricted area were not disrobing properly and were not using friskers but they stepped over the radiation boundary rope instead.
4. Smoking and drinking water was observed in an unauthorized area outside of the area set aside for smoking and drinking. Core drillers were observed on one roof inside the controlled area both without the proper clothing and one of them was smoking.
5. Some personnel did not remove their protective gloves in the smoking and drinking area. One person wearing two pairs of gloves did not remove his before smoking. A black, thin guy who works in rad waste carried cigarettes in the outer pocket of his coveralls on April 17 or 18.
6. Personnel were observed not using friskers on clean clothes prior to donning to insure that the clean protective clothes were clean.
7. At the south end of the gantry crane, a boundary rope was set up around contaminated material. The material included scaffolding, pipes, poles, clamps, and losely stacked stuff. Some of the material extended beyond the boundary rope.

8. On April 16 to 18, hand and foot monitors were broken or not in operation. When the guard at the monitor was asked why the monitor was not working, they said "I don't know, I think the circuit is turned off". These friskers are at the south end where most of the workers go in and out of the protected area. These friskers are the final monitors leaving the plant.
9. I was discriminated against by Bechtel Power Corporation, on April 22, 1980. A general foreman approached myself and two other new hires (electricians). He said "Ten new men were cleared for night shift except for a guy named Flanagan". I said "I am Flanagan". He said I would not be able to enter. The steward, Wes Young, arrived and told me that "Your check is waiting for you. At least I got you two hours show up time".

I have read the forgoing statement which begins on page 1 and ends on page 2. I have made and initialed all corrections. I have initialed the bottom of all pages. This statement is the truth to the best of my knowledge and belief.

Michael Wayne Flanagan

Harry S. North
Radiation Specialist

Philip V. Joukoff
Investigator

Safety Complaints Stir Probe At Nuclear Plant

The Nuclear Regulatory Commission is investigating an electrician's charges of sloppy safety procedures at the San Onofre nuclear power plant.

Michael Flanagan, 31, reported what he believes are eight radiation precaution infractions within 2½ days at San Onofre's Unit 1.

Flanagan said that last week he saw laborers entering controlled areas without protective clothing, improper disrobing after possible contamination, and workers leaving a containment area and using only one of two radiation detectors required for primary and secondary contamination checks, with three of seven persons observed stepping over a guide rope, apparently in an effort to save time.

He also said he saw smoking and drinking (of water) in unauthorized areas, the lack of degloving in smoking and drinking areas, failure by workers to use Geiger counters as required in clean clothing areas, and improper barriers that permitted so-called "crapped up" material, contaminated by dangerous alpha and beta particles, to extend beyond a confinement perimeter marked by a small rope.

Flanagan said whole body, walk-through detectors known as "frisk-ers" were inoperative last Wednesday through Friday.

Flanagan said "cheating on one of the (whole body) walk-through detectors" poses a risk to persons outside the confinement area of the plant.

"All kinds of people intermingle outside the containment areas at the plant," he said. "They mix at the lunch wagons, for instance, and have their hands in an ice container on the wagon."

Flanagan said he decided to complain not only because of a concern for safety but also because he is

(Continued on B-7, Col. 1)

Safety Complaints Stir Probe At Nuclear Plant

(Continued from B-1)

concerned

about the future of nuclear power.

"I am a proponent of nuclear power; if it is administered right, if proper procedures are followed and if every single person follows the procedures," he said.

Lewis Miller, an NRC representative at San Onofre, confirmed yesterday that he had talked with Flanagan and received a written list of the infractions Flanagan says he noticed.

Asked if Flanagan's complaints had merit, Miller replied: "We don't know yet. We have to investigate."

Miller said he had discussed Flanagan's report with his superiors at the NRC regional headquarters in Walnut Creek and was told that investigators from the office would visit the San Onofre plant today.

Southern California Edison Co., the plant operator, said the alleged safety infractions had not come directly to its attention.

"We have not received any copy of any complaint from the NRC," said Hans Ottoson, the utility's manager of nuclear generation. "However, we would not be notified until after the NRC investigation."

Ottoson said the utility had made no attempt to contact Flanagan, who returned to work last night after two days off.

Ottoson acknowledged that some procedural infractions could have occurred at the plant.

"We have had over 850 people on the site," he said. "A lot of these people are not intimately familiar with all the procedures. It requires a process of constant reminders

"Anyone seen breaking regulations would be reprimanded immediately and terminated if there was a repeat violation. We treat the rules very seriously and would not condone any willful violation."