

NOTICE OF VIOLATION

Southern California Edison Company  
San Onofre Nuclear Generating Station

Docket 50-206  
License DPR-13  
EA 93-122

During an inspection conducted March 1 - 5, and April 5 - 9, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 20.201(b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and which are reasonable under the circumstances to evaluate the extent of the radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, on February 19, 1993, the licensee did not make surveys that were reasonable under the circumstances to assure compliance with that part of 10 CFR 20.101 that limits radiation exposure to the hands, forearms, feet, and ankles. Specifically, a survey was not performed on a piece of highly radioactive material before a refueling worker picked it up in his hand. The material was subsequently surveyed at 1188 rem per hour.

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

- B. Technical Specification (TS) 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide (RG) 1.33, Revision 2, February 1978.

RG 1.33, Appendix A, Section 7(e)(1), recommends in part procedures for control of radioactivity, including procedures for a Radiation Work Permit System.

Licensee Procedure S0123-VII-9.9, "Radiation Exposure Permit Program," Revision 11, dated September 10, 1992, Section 6.3.2 states that "All personnel covered by a Radiation Exposure Permit shall follow the requirements specified in the Radiation Exposure Permit."

Licensee Radiation Exposure Permit (REP) No. 71494, "Refueling Activities in Containment/Fuel Handling Building," Revision 4, dated February 19, 1993, Section VI lists in part the following special instructions:

1. This REP does not allow the following:
  - a. Work on items with contact dose rates greater than 30 R(RAD)/hr [rem/hr].

2. Continuous health physics coverage is required for the following work:
  - a. Whole body Zone III entry with plastics and respirator

Contrary to the above:

1. On February 19, 1993, a refueling worker, did not follow the requirements of REP No. 71494, in that he handled an item having contact dose rates in excess of 30 R/hr (i.e., 1188 R/hr).
2. On February 19, 1993, a refueling worker wearing plastics and a respirator did not follow REP No. 71494, in that he performed work in the lower cavity, a posted Zone III area, without continuous health physics coverage.

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

- C. 10 CFR 19.12 requires in part that all individuals working in a restricted area shall be kept informed of the radiation in such portions of the restricted area ... and shall be instructed in ... precautions and procedures to minimize exposure to radioactive materials, ... the purpose and functions of protective devices employed, and ... the applicable provisions of the Commission's regulations and licenses.

Contrary to the above, on February 19, 1993, the licensee failed to instruct an individual prior to working in the lower refueling cavity, a restricted area, on the precautions and procedures to minimize exposure to radioactive materials. Specifically, this individual was not instructed on the purpose and functions of protective devices employed. As a result, the individual improperly placed an alarming dosimeter inside his protective clothing, which prevented him from minimizing his exposure (monitoring the accumulated dose and hearing the dosimeter alarm).

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

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555, with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector, San Onofre Nuclear Generation Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should clearly be marked as a "Reply to a Notice of Violation," and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an order or demand for information as to why the license should not be modified, suspended, or revoked, or why such other

action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California  
This 7<sup>th</sup> day of June, 1993