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SUBJECT: Suppls response to 890224 violations noted in Insp Repts  
 50-269/89-02, 50-270/89-02 & 50-287/89-02.

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**DUKE POWER**

March 22, 1989

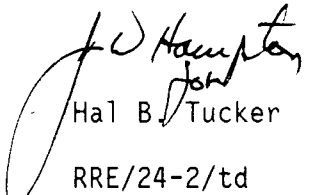
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Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/89-02  
Supplemental Violation Response

Gentlemen:

Please find attached a revised response to the subject Notice of Violation dated February 24, 1989 concerning failure to adequately inform workers of radiation in a work area. After a subsequent review, technical corrections were made to the original response. The response provided by this letter supercedes in its entirety the response provided by my letter dated March 17, 1989.

Very truly yours,

  
Hal B. Tucker

RRE/24-2/td

Attachment

cc: Mr. S. D. Ebnetter  
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VIOLATION (#269, 270, 287/89-02), SEVERITY LEVEL (IV)

10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area shall be kept informed of radiation in such portions of the restricted area and shall be instructed in precautions or procedures to minimize exposure.

Technical Specification 6.4.1 states that the station shall be operated and maintained in accordance with approved personnel radiation protection procedures.

Health Physics Section Manual 4.2, Paragraph 3.2.2.2 states if a hot spot is shielded to levels below the limits specified in Section 3.1.9, the hot spot sticker shall be affixed to the shielding and state conditions existing under the shielding.

Contrary to the above, on January 10, 1989, workers were not sufficiently informed of radiation in restricted areas in that they were not knowledgeable of radiation dose rates in their work area; including failing to affix hot spot labels on the shielding stating the radiation levels under the shielding.

**1. Admission or denial of the alleged violation.**

The violation is admitted. Section 4.2 of the Health Physics Section manual was not properly followed; however, it is noted that the dose rate information and/or Health Physics coverage was available to the workers upon request.

**2. Reason for violation:**

The HP technicians had identified several areas as areas with dose rates higher than normally expected (Hot Spots) by the average radiation worker. Radiation Control Zones (RCZs) were established around these areas along with radiation warning signs that indicated high dose rates existed on components in the area. RCZ boundary(s) were established where dose rates were ALARA. This method did not comply with the requirements of Section 4.2 of the Health Physics Section Manual. However, for ALARA reasons, Duke feels that this method of identifying areas with multiple Hot Spots is preferable to individual labels identifying spots.

Further, workers could not/did not respond to the questions asked by the inspector regarding area dose rate. A management deficiency existed in that inadequate emphasis was placed on requiring workers to use the resources available to him to ensure he was knowledgeable of dose rates in his work environment as required by the radiological protection program.

**3. The corrective steps which have been taken and the results achieved:**

Health Physics technicians have been counseled on the current requirements of the Health Physics Section Manual, Section 4.2 and instructed to strictly comply with these requirements.

**4. Corrective steps which will be taken to avoid further violations:**

- a. Health Physics procedures will be changed to allow Hot Spot(s) to be identified by individual labels on the Hot Spot(s) or by RCZ(s) with radiation warning signs that warn personnel of the hazards present. The method used will be determined by the Health Physics technician based on maintaining exposures ALARA.
- b. Training sessions will be conducted by supervision to reinforce the requirements for workers to obtain and maintain knowledge of dose rates in their work area. The Station Manager's staff notes will also be used to emphasize this.

The requirement for workers to obtain and maintain knowledge of dose rates in their work areas shall be included in the annual General Employee Training (GET) presented to all personnel who are allowed unescorted access to radiation areas.

**5. Date of full compliance:**

- a. April 15, 1989
- b. May 19, 1989