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RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 911213 ltr re violations noted in Insp Repts 50-269/91-31,50-270/91-31 & 50-287/91-31.Corrective actions: sluice procedure & Station Directive 3.3.2 will be revised.

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January 10, 1992

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/91-31
Reply to Notice of Violation

Dear Sir:

By letter dated December 13, 1991, the NRC issued Inspection Report No. 50-269/91-31, 50-270/91-31, and 50-287/91-31 with a Notice of Violation. Pursuant to the provision of 10 CFR 2.201, I am submitting a written response to the two violations identified in the above Inspection Report.

Very truly yours,

J. W. Hampton

cc: Mr. S. D. Ebneter, Regional Administrator
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IE01
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Violation 269,270/91-31-01

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures.

Operating Procedure OP/1&2/A/1104/23, Enclosure 4.3, Unit 1&2 Spare Purification IX (ion exchanger), Step 4.6, requires that valve 1HP-49 be closed prior to repeating steps to backflush the spare purification ion exchanger if the volumetric check is not between 518 and 572 gallons.

Contrary to the above, valve 1HP-49 was not closed as required by step 4.6 of Enclosure 4.3 to OP/1&2/A/1104/23 prior to repeating steps in the procedure to backflush the spare purification ion exchanger resulting in a spill of approximately 300 gallons of radioactive water and resin.

RESPONSE:

1. The reason for the violation, or, if contested, the basis for disputing the violation:

   The reason for this violation was a lack of attention to detail on the part of the Assistant Shift Supervisor. This occurred while lining up to do another backwash in preparation for an additional sluice of the spare purification demineralizer. During his preparations for this task, he failed to start the job at the appropriate place in the procedure and left HP-49 open during the backwash.

   Contributing to this event was the procedure used for the sluice of the spare purification demineralizer. It contains a built-in loop that requires going over previously completed steps if the volumetric check of the demineralizer indicates that resin is still left in the demineralizer shell. During this event, the volumetric check had failed twice and the Assistant Shift Supervisor decided that it would be better to use another procedure than to try to reuse the enclosure a third time. It was during the swap-over to the new enclosure that HP-49 was overlooked.

2. The corrective steps that have been taken and the results achieved:

   Immediate corrective actions were the survey and decontamination efforts required to clean up the spilled water, closing HP-49, and completing the resin sluice.

   The Assistant Shift Supervisor was counseled on the proper use and reuse of plant procedures. Emphasis was placed on adequate review of in-use procedures prior to their reuse.

3. The corrective steps that will be taken to avoid further violations:

   The sluice procedure will be reviewed and the built-in loop requiring the reuse of portions of the procedure will be removed or made more manageable.

   A training package will be issued and reviewed by each licensed operator on shift with regard to procedural usage and reusage. Emphasis will be placed on the necessity to properly review in-progress procedures in order to establish present plant status prior to continuing in a procedure.

4. The date when full compliance will be achieved:

   The sluice procedure will be revised prior to July 1, 1992.

   The training package will be issued prior to February 1, 1992 and will be reviewed by all Operations licensed shift personnel prior to July 1, 1992.

Violation 269,270,287/91-31-02

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures.

Station Directive 3.3.2, Section 3.4.4, requires all radioactive materials removed/transported from the Restricted Area, to be surveyed by the Radiation Protection (RP) group and labeled as radioactive material.

Station Directive 3.3.2, Section 3.4.6, requires scrap material to be surveyed for contamination prior to removal from the restricted area.

Contrary to the above, radioactive/contaminated material was removed from the Restricted Area without adequate surveying and labeling.

RESPONSE:

1. The reason for the violation, or, if contested, the basis for disputing the violation:

   This violation occurred because adequate controls were not in place to prevent the removal of unsurveyed radioactive asphalt from the Protected Area.

2. The corrective steps that have been taken and the results achieved:

   The asphalt which was removed from the Protected Area was surveyed and that asphalt found to be contaminated was returned to the Protected Area for proper disposal.

   The remaining contaminated asphalt at the job site, within the Protected Area, was containerized for proper disposal.

3. The corrective steps that will be taken to avoid further violations:

   a) Station Directive 3.3.2, Radioactive Material Control, will be revised to better define the Station's responsibility to notify and plan with Radiation Protection those work activities that will involve the removal of contaminated or potentially contaminated material from the Protected Area.

   b) The Radiation Protection Section Manual will be updated to include maps showing those ground locations within the Protected Area that are potential sources of radioactive material.

   c) This incident will be covered in the Oconee Nuclear Site Staff Notes.

   d) This incident will be presented in the Annual General Employee Training for a duration of one (1) year.

4. The date when full compliance will be achieved:

   Items a, b and c will be completed by March 1, 1992.

   Item d will be included in the Annual General Employee Training by March 1, 1992. This supplemental training material will be used for a duration of (1) year.