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SUBJECT: Forwards response to NRC 950727 ltr re violation noted in O
 insp repts 50-269/95-15,50-270/95-15 & 50-287/95-15.C/A:mgt R
 assigned selected RP personnel to monitor RCA exits &
 perform listed tasks during ONS Unit 3 outage.

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DUKE POWER

August 28, 1995

U.S. Nuclear Regulatory Commission
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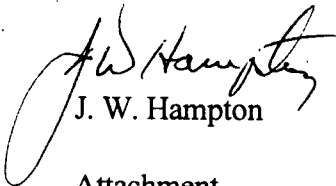
Subject: Oconee Nuclear Site
Docket No. 50-269,-270,-287
Inspection Report 50-269, -270, -287/95-15
Reply to Notice of Violation

Dear Sir:

By letter dated July 27, 1995, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/95-15, 50-270/95-15, and 50-287/95-15.

Pursuant to the provisions of 10 CFR 2.201, please find attached a written response to the Notice of Violation identified in the subject inspection report.

Very truly yours,


J. W. Hampton

Attachment

cc: Mr. S. D. Ebnetter, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

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August 28, 1995

Page 2

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Attachment 1
Reply to Notice of Violation
Violation 50-269, 270, 287/95-15-01

Technical Specification (TS) 6.4.1 states that the station shall be operated and maintained in accordance with approved procedures. Written procedures with appropriate check-off lists and instructions shall be provided, including personnel radiation protection procedures.

Oconee Nuclear Site Directive 1.1.2, "Radioactive Material Control," dated August 29, 1994, delineates the following requirements:

Step 3.1.1 - Personnel Frisking Requirements

Frisk yourself as required below or as otherwise directed by Radiation Protection (RP).

- a) Perform a minimum of a hand and foot frisk upon exit of a clean (not contaminated) radiation control zone (RCZ) located outside the radiation control area (RCA).
- b) Perform a whole body frisk upon exit of a contaminated area.
- c) Perform a whole body frisk upon exit of the RCA/RCA Buffer Zone(s) to clean areas.
- d) Perform a minimum of a hand and foot frisk when entering the RCA Buffer Zone from the RCA prior to changing elevations. If you are exiting the RCA and passing through the RCA Buffer Zone to the Turbine Building (all on same elevation), you may go directly to the whole body monitor at the RCA Buffer Zone/Turbine Building boundary and perform a whole body frisk prior to exiting the Turbine Building.

Step 3.1.2 - Equipment/Item Frisking Requirements

Frisk/Monitor equipment items for radioactivity as follows:

- a) Frisk your dosimetry, hard hats and safety glasses upon exiting a contaminated area or RCA by wearing them while performing a whole body frisk in the PCM-1B whole body monitor or by frisking them with a hand held frisker as any other hand held item(s). RP is required to monitor and release all other items that have been in contaminated area(s).

Attachment 1
Reply to Notice of Violation
Violation 50-269, 270, 287/95-15-01

- b) Frisk hand held items, clean carts and equipment, food and tobacco products that have been in an RCZ or the RCA but have not been in a contaminated area by using the same techniques and limits required for personnel frisking.
- c) Hand held items carried through the RCA Buffer Zone(s) do not require frisking if positive control is maintained of the items to ensure that they do not have the potential to be contaminated.
- d) Clean carts, etc., that are rolled through the RCA Buffer Zone(s) shall have their wheels and handles frisked prior to exiting the RCA Buffer Zone to clean areas.
- e) Food, drinks, tobacco products, chewing gum, etc., may be hand carried through the RCA Buffer Zone and RCA provided they are in a closed container and frisked as required for any other hand held item.

Contrary to the above requirements, during the period of June 13-26, 1995, the licensee identified: (1) approximately six instances in which an individual failed to employ proper personnel frisking requirements as noted in Step 3.1.1 above, and (2) approximately 158 instances in which personnel failed to employ proper frisking requirements as noted above in Step 3.1.2 for hand held items such as hard hats, lunch boxes, coolers, notebooks/papers, etc. In all instances, after each occurrence was noted by RP personnel, RP personnel directed the individuals or items to be properly frisked.

RESPONSE:

1. Reason for the violation:

Duke Power Company acknowledges the violation.

The reason for the violation is lack of site focus on adherence to the existing frisking program. Complexities of the current frisking program, such as multiple entrances, exits, and buffer zones, adversely affect personnel adherence to the program.

Attachment 1
Reply to Notice of Violation
Violation 50-269, 270, 287/95-15-01

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

Oconee management assigned selected RP personnel to monitor RCA exits and perform the following tasks during the Unit 3 outage:

- a. Identify any problems with personnel frisking and the frisking of hand held items;
- b. Immediately correct violations of accepted frisking procedures by informing and instructing personnel in proper procedures and methods; and
- c. Provide data upon which decisions could be made to increase the effectiveness of the frisking program.

The assigned personnel corrected any frisking errors observed during the assessment. The assessment data showed an improving trend in frisking practices during the Unit 3 outage.

During the outage, a Radiation Protection (RP) Timeout was called and all work was stopped. The purpose of the timeout was to emphasize the importance of ALARA, RWP adherence, and proper frisking practices.

Oconee Nuclear Station team notes have included radiation contamination control reminders. These communications emphasize that attention to detail is required of all personnel interacting with the frisking program.

Additionally, Oconee RP management has initiated an effort to require its supervision to spend more time in the field observing radiological work practices. This effort has resulted in the correction of frisking problems on an individual basis. In addition, these observations have been documented and will be used in assessing future enhancements to the program.

Attachment 1
Reply to Notice of Violation
Violation 50-269, 270, 287/95-15-01

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

A Human Performance Enhancement System (HPES) investigation determined the common cause of the frisking errors and recommended enhancements to the program. A working group, headed by the Oconee Site Radiation Protection Manager, and comprised of representatives from affected working groups at the site, has been formed to study personnel frisking program requirements. The working group will consider the HPES recommendations, the Unit 3 refueling outage assessment, and the field observation data to develop a plan for program improvements. The study will focus on simplifications to the existing frisking program, initiatives to enhance personnel adherence to the program, and methods to monitor the program to ensure that implemented enhancements are effective. This study of the frisking program will be completed by 10/15/95.

4. Date when full compliance will be achieved:

The improper frisking instances cited in this violation were immediately corrected after each occurrence. Therefore, Oconee Nuclear Site is in compliance.