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SUBJECT: Forwards addl info re violation noted in Insp Repts  
 50-269/87-03, 50-270/87-03 & 50-287/87-03. Response supersedes  
 870304 response. Corrective actions: radiation work permit  
 revised & training package developed.

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April 23, 1987

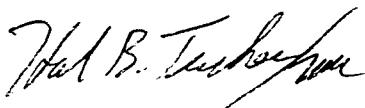
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Subject: Oconee Nuclear Station  
IE Inspection Report  
50-269, -270, -287/87-03

Gentlemen:

By letter dated March 4, 1987, Duke provided a response to the subject Notice of Violation dated February 11, 1987. The attached submittal provides additional material in response to the subject item of non-compliance and supersedes the March 4, 1987 response in its entirety.

Very truly yours,



Hal B. Tucker

PJN/161/jgm

xc: Mr. J.C. Bryant  
NRC Resident Inspector  
Oconee Nuclear Station

Dr. J. Nelson Grace, Regional Administrator  
U.S. Nuclear Regulatory Commission - Region II  
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VIOLATION:

10CFR20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10CFR20.201(a) states that "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, the requirement to make suitable surveys as may be necessary to comply with the regulations & are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present were not met January 13, 1987, adequate radiological controls were not established for work on a reactor coolant pump which resulted in three individuals becoming externally contaminated and receiving intakes of radioactive material ranging from 11 to 202 times the quantity that would result from inhaling air containing uniform concentrations specified in Appendix B, Table 1, Column 1 for one hour.

Amended Response:

1. Admission or denial of the alleged violation:

This violation is admitted, in as much as, the potential radiological airborne hazard was not adequately assessed. The actual exposure range is 13.5 MPC-hrs to 189.5 MPC-hrs.

2. Reason for violation

This violation resulted from personnel error, failure of a Health Physics Vendor technician to adequately assess the potential airborne hazard based on measurements of removable and fixed radioactive contamination.

The radiation work permit (RWP), under which the work was performed was adequate in that it called for respiratory protection as required by Health Physics.

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

The radiation work permit (RWP), governing the job, was immediately revised to require respiratory protection for all personnel performing hands on work. This action will prevent any further unexpected intakes of radioactive material.

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

A. A training package (HP Notice 87-01) has been developed for all Health Physics job coverage technicians (both in-house and vendor technicians) and includes the following learning objectives:

1. Gain a clear understanding of the sources of airborne radioactive contamination.
2. Gain an understanding of how the history of the component can affect the potential hazard of airborne radioactive contamination.
3. Gain an understanding of the proper use and testing of engineered controls, such as temporary ventilation systems.

4. Gain an understanding of how the physical work activity involved can effect the probability of airborne radioactive materials and the rate of uptake; e.g., strenuous, hammering, scraping, etc.
  - B. Update the Vendor Site Specific Lesson Plan to include the learning objectives listed in A and a review of the events which occurred as listed in IIR 087-03-04 (Incident Investigation Report).
  - C. Update the Health Physics Technician Initial Training Program to include all the information listed in B.
  - D. Revise Health Physics procedures governing the use of respirators to include specific radioactive contamination levels (loose and fixed); above which respirators will be required.
  - E. Update employee ETQS training task for job coverage to include criteria for respiratory protection.
5. Date of full compliance:
  - A. Training of all HP personnel to HP Notice 87-01 was completed prior to the commitment date of March 20, 1987.
  - B. The update of the vendor site specific lesson plan will be completed by July, 1987.
  - C. The update of the HP initial training for new employees will be updated by August, 1987.
  - D. The revision of procedures governing use of respirators will be completed by June, 1987.
  - E. The update of the ETQS training task for job coverage will be completed by August, 1987.