## APPENDIX A

## NOTICE OF VIOLATION

Pacific Gas and Electric Company 77 Beale Street, Room 1435 San Francisco, California 94106

Docket Nos. 50-275 & 50-323 License Nos. DPR-80 & DPR-82

During an NRC inspection conducted on December 16-20, 1985, three violations of NRC requirements were identified. The violations involved adherence to Technical Specification requirements for determining the release rate for iodines and particulates prior to containment purges and adherence to technical specification required procedures involving tests of a liquid radwaste discharge valve and failure to mark charts. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985) the violations are listed below:

Technical Specification 4.11.2.1.2 states, in part, that the dose rate Α. due to iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents shall be determined in accordance with the methodology and procedures of the Offsite Dose Calculation Procedure (ODCP) in accordance with the sampling and analysis program specified in Table 4.11-2. Table 4.11-2 requires, in part, that the analysis for these radionuclides shall be determined prior to each containment purge. Technical Specification 3.11.2.1.b specifies the dose rate limit at the site boundary.

Contrary to the above requirement, from May 1, 1985 to December 13, 1985, the licensee did not determine the dose rate due to iodine-131, iodine-133, and all radionuclides in particulate form with half-lives greater than 8 days prior to each release of gaseous effluents from planned purges of the Units 1 and 2 containment atmospheres.

This is a Severity Level IV Violation (Supplement I)

Technical Specification 6.8.1 states, in part, "Written procedures shall Β. be established, implemented and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978..." Operating Procedure, OPG-1:II, "Liquid Radwaste System - Processing and Discharge of Liquid Radwaste," established pursuant to this specification requires in Steps 12.a and b. that the operator, just prior to the start of a discharge perform a source and pulse cal check of RE-18 (liquid radwaste discharge monitor) including verification that RCV-18 closes and FCV-477 opens and the High Radiation annunciator PK11-21 is received. OP G-1:II, step 12.c requires that the source and pulse cal checks for RE-18 be logged in the control operators log.

Contrary to the above requirement, on December 2, 1985, the source and pulse cal checks were not performed for a liquid radwaste discharge of Waste Evaporator Condensate Tank (WECT-01) (discharge permit No. 85-361).

This is a Severity Level V Violation (Supplement I)

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C. Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix A of RG 1.33, Revision 2, February 1978..." Administrative Procedure APC-152, "Recording Charts," established pursuant to this specification requires in Step 4 that each rolling chart be time struck by 0200 each day.

Contrary to this requirement, on December 1, 3 and 5, 1985, chart No. 1-49 (Control Room Radiation Monitoring Chart) was not dated or time struck.

This is a Severity Level V Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JAN 24 1986

Dated

F. A. Wenslawski, Chief Emergency Preparedness and Radiological Protection Branch

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