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50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
AUTH.NAME AUTHOR AFFILIATION
RUEGER,G.M. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 911129 ltr re violations noted in Insp Repts
50-275/91-29 & 50-323/91-29. Corrective actions: addl training
will be provided to onsite radiation protection personnel re
labeling radioactive matl containers in timely manner.

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Pacific Gas and Electric Company

77 Beale Street
San Francisco, CA 94106
415/973-4684

Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

December 30, 1991

PG&E Letter No. DCL-91-314

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Reply to Notice of Violation in NRC Inspection Report
Nos. 50-275/91-29 and 50-323/91-29

Gentlemen:

NRC Inspection Report Nos. 50-275/91-29 and 50-323/91-29, dated November 29, 1991, contained a Notice of Violation citing two Severity Level IV violations regarding PG&E's Radiation Protection Program. PG&E's response to the Notice of Violation is enclosed.

Sincerely,



Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Philip J. Morrill
Harry Rood
Howard J. Wong
CPUC
Diablo Distribution

Enclosure

DCO-91-TC-N093

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ENCLOSURE

REPLY TO NOTICE OF VIOLATION IN NRC INSPECTION REPORT
NOS. 50-275/91-29 AND 50-323/91-29

On November 29, 1991, as part of NRC Inspection Report Nos. 50-275/91-29 and 50-323/91-29, NRC Region V issued a Notice of Violation citing two Severity Level IV violations for Diablo Canyon Power Plant (DCPP) Units 1 and 2. The statements of violation and PG&E's response follow.

A. STATEMENT OF VIOLATION "A"

10 CFR 20.203(f) requires, that except as provided by 10 CFR 20.203(f)(3), each container of specified amounts of licensed material bear a durable, clearly visible label identifying the radioactive contents.

1. Contrary to the above, on September 24, 1991, a shielded High Integrity Container (HIC) (No. 14195) of dewatered resins, located on the 115' level of the east radwaste processing and storage yard, containing approximately 83.413 Curies of mixed radionuclides did not bear any label identifying the radioactive contents and the container was not excepted from such labeling.
2. Contrary to the above, on October 16, 1991, a B-25 Box (No. 5), located immediately outside of the Radwaste Building at Bay No. 6, of assorted radioactive material containing approximately 7.28 milliCuries (mCi) of mixed radionuclides did not bear any label identifying the radioactive contents and the container was not excepted from such labeling.

This is a Severity Level IV violation. (Supplement IV)

A.1 REASON FOR THE VIOLATION IF ADMITTED, OR BASIS FOR DISPUTING THE VIOLATION

PG&E acknowledges that the second example of labeling deficiencies identified in the Notice of Violation was not in accordance with the regulations in 10 CFR 20.203(f).

Regarding the first example, the "container" that was not labeled was actually a concrete shield surrounding the HIC. The shielded HIC is used during the solidification or dewatering of resins, filter media, and other radwaste products. PG&E believes that the concrete shield did not require a radioactive materials label because it is considered to be "process equipment" exempt from labeling requirements in accordance with 10 CFR 20.203(f)(3)(vii). This regulation states "labeling is not required ... for manufacturing or process equipment, such as nuclear reactors, reactor components, piping, and tanks." Placing a barricade around the shields, labeling the HIC within the shield, and posting the area with such signs as "Caution - Radiation Area" and "Caution - Radioactive Material Storage Area" as conditions warranted, are



considered to be sufficient. However, as noted in paragraph A.3 below, the shield will be labeled.

Regarding the second example, the box was labeled as radioactive material, but did not have information regarding contamination levels or dose rates as required by the PG&E procedures referenced in paragraph C below. Workers were sorting radioactive equipment into boxes, cleaning up the area, and arranging the boxes. They had not yet completed the job when the violation was noted. Though the initial labeling of the box as radioactive material had been performed, the additional required informational tagging had not yet been done. Because the workers did not maintain positive control of the area around the box and warn approaching personnel, the box was not exempt from labeling requirements in accordance with 10 CFR 20.203(f)(3)(iv). This regulation states "labeling is not required ... for containers when they are attended by an individual who takes the precautions necessary to prevent the exposure of any individual to radiation or radioactive materials in excess of the limits established by the regulations in this Part."

A.2 CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The two examples of labeling deficiencies were corrected immediately upon discovery. Shortly after the occurrence of the second example, the need to maintain positive control of unlabeled radioactive materials was discussed in departmental turnover meetings. As a result, documented tailboards with Radiation Protection personnel are currently in progress.

A.3 CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. Although PG&E does not believe them to be required, labels bearing the words "Caution - Radioactive Material" have been attached to the two onsite concrete shields. Other informational labels will also be added to provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.
2. PG&E will provide additional training to onsite Radiation Protection personnel. This training will provide instructions on labeling radioactive material containers in a timely manner, and in accordance with PG&E procedures referenced in paragraph C below and 10 CFR 20.203. The training will emphasize that individual workers are responsible for providing positive controls in lieu of labeling during work in progress. The training will also be provided to contract technicians prior to the upcoming Unit 1 fifth refueling outage.

A.4 DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance with 10 CFR 20.203(f).



B. STATEMENT OF VIOLATION "B"

10 CFR 20.203(b) requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "Caution Radiation Area."

1. Contrary to the above, on October 16, 1991, a radiation area at the resin dewatering facility (115' level of the Rad Waste Yard) was not posted as required. Radiation levels measuring 6 millirem per hour (mrem/hour) were detected at eighteen inches (18") from the surface of B-25 Box No. 40.
2. Contrary to the above, on October 16, 1991, the radiation area in the 115' level of the Rad Waste Yard, immediately adjacent to Bay No. 3 of the Rad Waste Building, was not posted as required. Radiation levels measuring 6 mrem/hour were detected at 18" from the surface of B-25 Box No. 5.
3. Contrary to the above, on October 16, 1991, a radiation area adjacent to the reactor coolant drain tank (RCDT) discharge drain line located on the 55' level of Unit 2's Auxiliary Building was not posted as required. Radiation levels measuring 30 mrem/Hr were detected at 18" from the surface of valve LWS-2-9D.

This is a Severity Level IV violation. (Supplement IV)

B.1 REASON FOR THE VIOLATION IF ADMITTED, OR BASIS FOR DISPUTING THE VIOLATION

PG&E acknowledges that the three examples of radiation area posting deficiencies identified in the Notice of Violation were not in accordance with the regulations in 10 CFR 20.203(b).

Regarding the first example, the event occurred during a plant refueling outage. The box had been moved out of a posted radiation area into an area that was posted for radioactive materials. However, due to a miscommunication during the increased workload and activities at the 115' level of the Rad Waste Yard during the outage, Radiation Protection was not notified to survey the area and post it as a general radiation area.

Regarding the second example, B-25 Box No. 5 was the same box noted in example 2 of violation "A" above. Posting of the area around the box was required because workers did not maintain positive control of the area, though work was still in progress. If the workers had exercised positive control, the area would have been exempt from posting requirements as allowed by 10 CFR 20.204(c).

Regarding the third example, the radiation levels in the area typically build up and are then decreased due to automatic system operation. The area typically remains posted and daily surveys of the area are



performed. In this case, the area was surveyed shortly after system operation to decrease dose rates, and existing postings were removed in order to avoid overposting the area. The Radiation Protection personnel that removed the posting failed to consider the continually changing nature of the area dose rates. Because the high radiation levels measured by the inspectors were in the overhead area and were not easily accessible to personnel, there was no effect on personnel health or safety.

B.2 CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The three examples of radiation area posting deficiencies were corrected immediately upon discovery. Regarding the third example specifically, the RCDT drain line on both units was posted as a radiation area, and additional information was added to the posting indicating that dose rates in the area are continually changing.

B.3 CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. As noted in paragraph A.3 above, PG&E will provide additional training to onsite Radiation Protection personnel. This additional training will cover the requirements of 10 CFR 20.203 for radiological labeling and posting, including an emphasis on positive controls in lieu of posting.
2. A note will be added to the appropriate procedures advising that during periods of high activity, such as major plant refueling outages, Radiation Protection supervision may direct that the 115' level of the Rad Waste Yard be posted as a radiation area. Localized postings within these areas providing additional information will be used as appropriate.
3. PG&E will evaluate whether there are areas in the plant similar to the RCDT drain line area that should be continuously posted as radiation areas due to continually varying conditions.
4. In order to provide continued assurance of proper outage-related radiological posting practices, a High Impact Team (HIT) will be created for the upcoming Unit 1 fifth refueling outage. A HIT at Diablo Canyon Power Plant is a multidisciplinary group of plant personnel focused on completing or improving an outage-related activity. This team will address the process of moving outage-related radioactive materials.

B.4 DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is currently in full compliance with 10 CFR 20.203(b).



C. REFERENCED PG&E DIABLO CANYON POWER PLANT PROCEDURES

1. Radiation Control Standard RCS-4, "Control of Access"
2. Radiation Control Standard RCS-6, "Control of Radioactive Materials"
3. Radiation Control Procedure RCP D-240, "Posting of Radiologically Controlled Areas"
4. Radiation Control Procedure RCP D-610, "Control and Release of Materials from Radiologically Controlled Areas"
5. Radiation Control Procedure RCP RW-1, "Collection, Packaging, Storage, and Accountability of Low-Level Radioactive Waste"
6. Administrative Procedure AP D-55, "Job Site Tool Control"

