

Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

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September 25, 1987  
G02-87-253

Docket No. 50-397

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

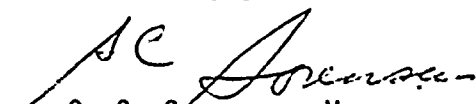
Subject: NUCLEAR PLANT NO. 2  
LICENSE NO. NPF-21  
NRC INSPECTION REPORT 87-24

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 2, 1987. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, an explanation of our position regarding the validity of the violation is provided.

Should you have any questions regarding our response, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

JDA/bk  
Attachment

cc: JB Martin, NRC RV  
NS Reynolds, BCP&R  
RB Samworth, NRC  
DL Williams, BPA - 399  
NRC Site Inspector - 901A

~~8709300425~~  
3PP

APPENDIX A

During an NRC inspection conducted on August 3-6, 1987, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

- A). 10 CFR Part 20.203(f)(1) and (2) state: "Except as provided in paragraph (f)(3) of this section, each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. (2) A label required pursuant to paragraph (f)(1) of this section shall bear the radiation caution symbol and the words 'CAUTION, RADIOACTIVE MATERIAL' or 'DANGER, RADIOACTIVE MATERIAL'. It shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposure."

Contrary to the above, on August 4, 1987, Shipping Container No. 88255, located on the loading dock outside the southwest end of the Radwaste Building, contained licensed radioactive material in excess of the limits specified in 10 CFR Part 20, Appendix C, was not labeled and did not contain information which would permit individuals working in the vicinity of the container to take precautions to avoid or minimize exposure.

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

Validity of Violation

The Supply System acknowledges the validity of the violation. The labels were blown off due to weather conditions (sun, heat, wind, etc.)

Previous actions (surveillance frequency) taken to protect outdoor radioactive material labels from extreme environmental conditions appear to be inadequate.

Corrective Steps Taken/Results Achieved

1. Plant personnel took immediate action to re-label the containers.
2. The outside radioactive material storage area is now inspected by Health Physics personnel on at least a weekly basis.
3. Radioactive material container labeling and Health Physics tour inspection assignment have been discussed during Health Physics group meetings.
4. These actions assure that these containers are properly labeled at all times. The weekly inspection of this area will not be discontinued unless it is replaced by a mechanism which provides at least the same degree of assurance that the containers will be properly labeled at all times.



Corrective Action to be Taken

Plant personnel are in the process of evaluating other means to achieve a permanent solution to this problem including:

1. Continued experimentation with different labeling media, protective coverings and affixing methods or;
2. Maintenance of a separate log, for all containers stored outside, which would contain all pertinent information associated by container number. Area postings would include a special instruction referring to the log.

Date of Full Compliance

The evaluation will be completed by October 15, 1987.

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8709300425 DOC. DATE: 87/09/25 NOTARIZED: NO DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397  
 AUTH. NAME AUTHOR AFFILIATION  
 SORENSEN, G. C. Washington Public Power Supply System  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 870902 ltr re violations noted in Insp Rept  
 50-397/87-24. Corrective actions: outside radioactive matl  
 storage inspected by health physics personnel on weekly  
 basis.

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	NRR/DREP/RPB	2	2	NRR/DRIS DIR	1	1
	NRR/PMAS/ILRB	1	1	DE LIEBERMAN, J	1	1
	OGC/HDS2	1	1	<u>REG FILE</u>	1	1
	RES DEPY GI	1	1	RGNS FILE 01	1	1
INTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			

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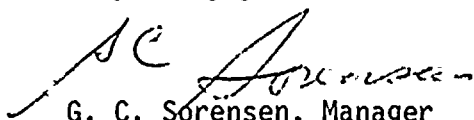
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