WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

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February 3, 1989
G02-89-014

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 88-41
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated January 5, 1989. 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, each violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

JDA/bk
Attachments

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

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APPENDIX A

During an NRC inspection conducted November 28-December 2, and December 12-16, 1988, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), as modified by 53 Fed. Reg. 40019 (October 13, 1988), the violations are listed below:

A. Technical Specification 3/4.11.2.1 requires, in part, that in order to determine that the dose rate limits of 3.11.2.1 are not exceeded, samples must be obtained in accordance with Table 4.11-2, and the dose rates determined in accordance with the methodology and parameters of the Offsite Dose Calculation Manual (ODCM). Table 4.11-2 requires, in part, that iodine and particulate grab samples be obtained prior to each vent and/or purge of the Primary Containment atmosphere. Table 4.11-2 further requires, in part, that these samples be analyzed for principal gamma emitters, as specified therein.

Contrary to the above, from November 27, 1985, to December 16, 1988, with the exception of those samples which were obtained for startup, shutdown, or greater than 15% thermal power changes, grab samples of iodine and particulates were not obtained and analyzed prior to each vent and/or purge of the Primary Containment.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The basis for the violation is a WNP-2 Technical Specification Interpretation (TSI) implemented on November 27, 1985 which provided clarification regarding the necessity to sample and analyze the drywell atmosphere prior to the start of venting and purging through the Standby Gas Treatment (SGT) System. The TSI was requested due to the conflict between Technical Specification sections 4.11.2.1.2 and 4.11.2.8.3. Section 4.11.2.8.3 requires that the containment drywell be sampled and analyzed (per Table 4.11-2) within 8 hours prior to the start of, and at least once per 12 hours, during venting and purging of the drywell through other than the SGT System. The implication here was that no sampling was necessary while purging/venting through SGT and this LCO controlled system configuration during venting/purging. Section 4.11.2.1.2 requires the dose rate to iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents, be determined to be within specific limits by obtaining samples and performing analyses in accordance with Table 4.11-2 (Radioactive Gaseous Waste Sampling and Analysis Program). This section does not specifically exclude the sampling and analyzing requirement when venting and purging through the SGT System, and was viewed as representing the type of sample required.

The TSI concluded that sampling was not required prior to or during venting and purging through the SGT System. However, the TSI also concluded that sampling and the associated analysis would be required within 8 hours prior to interaction of a vent or purge through other than SGT, and repeated on a 12 hour frequency during such a vent and purge operation.

The interpretation was discussed with the Special Projects Branch of NRR.

Corrective Steps Taken/Results Achieved

Upon notification that this unresolved issue was to become a potential enforcement item, our process was immediately changed such that sampling and evaluating the primary containment would be performed prior to venting or purging.

Applicable Operations and Chemistry procedures were changed to require that, for all venting and purging operations, the drywell be sampled and analyzed within 8 hours prior to the start of and at least once per 12 hours during venting and purging.

In addition, the TSI involved was cancelled.

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

The Supply System is currently in full compliance.

B. Technical Specification 6.12.1 states, in part:

"...each high radiation area in which the intensity of radiation is greater than 100 mrems/h but less than 1000 mrems/h shall be barricaded and conspicuously posted as a high radiation area..."

"...Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received..."

c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device..."

Contrary to the above, on December 1, 1988, two individuals entered an area on the 501' elevation of the Reactor Building, where the intensity of radiation measured up to 130 mrems/h, without either the equipment specified above or being accompanied by an individual qualified in radiation protection procedures.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reasons for the violation are as follows:

- The laborers involved failed to read and understand the Radiation Work Permits (RWP), and also failed to realize that Health Physics (HP) personnel are responsible for directing the movement of Hi-Rad boundaries.

- The pre-work brief for the containment tent construction did not address how the tent wall was to be built through the Hi-Rad boundary.

Corrective Steps Taken/Results Achieved

1) On January 10, 1989, in a letter to all Plant personnel, the Plant Manager communicated his expectations regarding compliance with radiological controls and discussed the consequences for individuals who fail to comply with such controls.

2) The RWP policy has been modified such that greater emphasis is being placed on job-specific RWPs for work in Hi-Rad areas.

3) Prior to performing work in radiological controlled areas, the laborers involved were required to:

- Successfully complete the two-day General Employee Training (GET) class
- Review the Hi-Rad area video training tape.
- Review, with Health Physics supervision, their responsibilities when working in radiological controlled areas.

4) All RWPs specifically written for Hi-Rad areas have been placed at HP access control and require a briefing on the requirements for those areas.

Corrective Action to be Taken

1) A programmatic change to the ALARA process will be made to reduce the threshold of those RWPS which require a pre-job briefing.

2) All line managers reporting to the Plant Manager will train, with assistance from the Plant HP/Chemistry Manager, their personnel on radiological control requirements.

Date of Full Compliance

1) Changes to the ALARA process will be made by March 15, 1989.

2) Training will be completed prior to the 1989 maintenance and refueling outage.

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