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 FISH, R. Region 5, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-397/88-29.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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March 3, 1989

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Docket No. 50-397

Mr. R. Fish
Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Dear Mr. Fish:

SUBJECT: OSC RADIATION SAFETY MAINTENANCE

REFERENCE: Inspection Report No. 50-397/88-29

We have reviewed the issues surrounding the observations of OSC activities and submit the following information to indicate the corrective action which is underway.

Item 8.A

"The OSC did not inform the other ERFs of the SBTG filter failure."

Response

In the future, the OSC Director will be required to review all Team Debriefing forms in more detail and interview the teams when information is lacking or questions arise. This deficiency was not a procedural error but rather a lack of digesting all of the information in communicating with the other emergency response facilities. This deficiency will be reviewed by all qualified OSC Directors and Phone Communicators. In addition, a copy of the Corrective Action Record has been provided to the emergency preparedness training coordinator for inclusion in the refresher training for the OSC.

Item 8.B.

"A positive method (e.g., checkoff list, signature form) of notifying and assuring that all OSC workers had taken potassium iodide (KI) tablets was not utilized. Two verbal announcements were made by the OSC Director; however, there were a number of repair/monitoring teams in the plant at the time."

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Response

The Lead Health Physics person assigned to the OSC will be responsible for development of a hard copy log to track the administration of KI to emergency workers in the plant Protected Area. The log will consist of a notation next to the person's name on the Personnel Accountability Log (EPIP 13.5.5, Attachment 3). The accountability list notation will also ensure that notification was received. Health Physics personnel will be instructed on this method of tracking KI administration as part of the annual OSC refresher training, and by appropriate procedural change.

Item 8.C.1.

"Contamination control points were not established at the entrances to the General Service Building and the OSC in accordance with EPIP 13.10.9, "OSC operations and OSC Director Duties."

Response

EPIP 13.10.9 will be reviewed by all personnel assigned as OSC Director. There will be a proposed revision forwarded to the Emergency Planning Organization on EPIP 13.10.9 to include a check-off sheet for the OSC Director as to his duties during the drill. This action was completed January 6, 1989.

Item 8.C.2.

"Two women were allowed to continue to sit within 15-18 feet of the 3 R/hr area (at the windows)."

Response

It is true that two personnel were allowed to continue to sit within 15-18 feet of the 3 R/hr area at the windows, however, the survey data supplied by the Controller in the OSC indicated a 35 mR/hr field where the two individuals were sitting. This was verified by the Lead Controller in the OSC. We have initiated an effort to improve realism and technical accuracy of the Controller information supplied in plant radiological data. In addition, an individual with extensive health physics experience was added to the scenario development section of the Emergency Planning organization. This action will promote inclusion of realistic and scenario consistent radiological data in drills and exercises.

Item 8.C.3

"No smears or air samples were taken in the OSC following the simulated release. EPIP 13.10.10, "HP, Chemistry and Maintenance Support Duties provides for monitoring for habitability."



Response

Health Physics personnel will be instructed to include smear techniques as part of the OSC habitability surveys. The Continuous Air Monitor will be set up outside the OSC as before to keep ambient noise levels down, however, extended sample tubing will be used to draw the air sample from within the OSC. This action is included as part of OSC refresher training currently underway. A revision to EPIP 13.10.10 will also be made to include these actions.

Item 8.C.4

"It took 24 minutes to post the high radiation area in the OSC (near windows) after the radiation survey was made."

Response

Health Physics personnel assigned to the OSC will be instructed to place a portable alarming area radiation monitor in the OSC to provide continuous monitoring of area dose rates. They will be instructed to resort to hand held instrumentation for surveys in the case of ARM alarm or failure. This action is included as part of OSC refresher training which is currently underway. A revision to EPIP 13.10.10 will be made to include these actions.

Item 8.C.5

"Radiological members of two different reentry teams did not follow suit-up procedures. Tape was not used on the front closure of the protective clothing (PC)."

Response

The need to follow normal protective clothing dress requirements, including taping during drills and exercises, will be reemphasized in annual OSC refresher training courses. The additional drills we plan in 1989 (first one conducted on February 3) will emphasize realism and require, for example, that emergency team members utilize PCs and self-contained breathing apparatus at least one time during the drill if their team assignment requires it.

Item 8.C.6.

"The radiation technician accompanying one reentry team did not demonstrate the proper use of a survey instrument. The technician did not hold the meter in front and he did not periodically refer to it for dose rates. Dose rates would have been provided by the controller."

Response

The need to simulate survey techniques in as close to normal a manner as possible, and the role of gamesmanship in drills and exercises will be included in annual OSC refresher training. It was an item closely observed during the conduct of the February 3, 1989, drill and there was demonstrated improvement.

Item 8.C.7

"The OSC did not assist in the coordination of the security response to Building 17. A radiation technician was not dispatched to provide monitoring capabilities for the officers and officers were not directed to don PCs."

Response

We have made arrangements to have security resources an integral part of the drills and exercises. We utilized a security interface to coordinate these activities on a test basis during the February 3, 1989, drill; and it was very effective.

Item 8.C.8

"Personnel remaining within the OSC were never reminded to check their dosimeters, even after the dose rate at one end of the room reached 3 R/hour."

Response

Health Physics personnel assigned to the OSC will be instructed to remind OSC personnel to check their dosimeters on a periodic basis commensurate with the existing radiological conditions. This instruction will take place as part of the annual OSC refresher training. EPIP 13.10.10 will be revised to require this periodic check.

Item 8.C.9

"Rack of spare dosimeters were left within 10-15 feet of the 3 R/hour area."

Response

No action is anticipated on this item since the dosimeters are zeroed on issue so previously accumulated dose before issue is not relevant.



Mr. R. Fish
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Item 8.C.10

"The radiation technician in the OSC made no attempt to perform a detailed radiation survey after being told of the 3 R/hour dose rate at the window. The technician did not attempt to determine whether the source of the radiation was due to sky shine, ground deposition or airborne material."

Response

The investigation of the outside source of dose would not normally be performed by the Lead HP without specific direction from the Radiation Protection Manager (RPM). This monitoring task is an aspect of dose assessment that could be done either as a result of an RPM request or a relayed request of an RPM from MUDAC. In any event it is a task fully managed and directed by the RPM.

We believe that the recent PASS/Man Down Drill demonstrated a good measure of success, and we will continue our efforts both in training and the practical drills to improve our performance.

If you have any questions on our responses, please do not hesitate to call me at (509) 372-5238.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

GCS/RAC/vlc