

NOTICE OF VIOLATION

Washington Public Power Supply System
(Supply System)
Nuclear Project No. 2 (WNP-2)

Docket No. 50-397
License No. NPF-21

During an NRC inspection conducted on April 8-20, 1991, 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 (1991), the violations are listed below:

- A. WNP-2 Technical Specification (TS) 6.12.1, states, in part, that "In lieu of the "control device" or "alarm signal" required by . . . 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrems/h [millirems per hour] but less than 1000 mrems/h shall be barricaded and conspicuously posted as a high radiation area..." Also, TS 6.12.2, states, in part, that: "areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrems shall be conspicuously posted..." WNP-2 procedure 11.2.7.1, "Area Posting," paragraph 7.3, "High High Radiation Area," requires, in part: "areas with dose rates greater than 1000 millirem be barricaded, posted and at each access point post a radiological symbolic sign stating "HIGH HIGH RADIATION AREA..."

Contrary to the above, on April 15, 1991, (1) the equipment hatch providing general access to the reactor containment drywell, with general area dose rates exceeding 100 millirem per hour, was not posted as a high radiation area; and (2) an area adjacent to the shielding on reactor coolant recirculation pump "B" piping on the 501 foot elevation within the drywell, with radiation dose rates exceeding 1000 millirem per hour, was not posted as a High High Radiation Area.

This is a Severity Level IV Violation (Supplement IV)

- B. TS 6.11.1, "Radiation Protection Program," requires that "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure." 10 CFR Part 20, Appendix A, Footnote "f" states that canisters and cartridges shall not be used beyond service-life limitations. WNP-2 procedure 11.2.11.4, "Use of Respiratory Protection Equipment," requires, in part, that the Health Physics Technician issuing a GMR-I canister (iodine sorbent canister for use with negative pressure respiratory protection equipment) shall verify that for each canister used that the seal is intact, the canister shelf life has not expired, and the appropriate MSA label is attached to the GMR-I canister.

Contrary to the above, on April 17, 1991, ten GMR-I canisters were issued to workers for use during the reactor vessel head removal on the 606 foot elevation of the reactor building and the shelf life of the canisters had expired on March 31, 1991.

This is a Severity Level IV violation (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, the Supply System is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for the violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, CA
this 5th day of May 1991

