Docket No. 50-397

Washington Public Power Supply System
P. O. Box 968
3000 George Washington Way
Richland, Washington 99352

JUL 12 1991

Attention: Mr. G. D. Bouchey, Director
Licensing and Assurance

SUBJECT: WPPSS RESPONSE TO NOTICE OF VIOLATION CONTAINED IN NRC INSPECTION REPORT NO. 50-397/91-10

Thank you for your letter dated June 12, 1991, in response to our Notice of Violation, dated May 15, 1991, informing us of the steps your have taken to correct the items which we brought to your attention.

Your corrective actions appear to resolve our concerns regarding the violations referenced in the subject report. Your corrective actions will be verified during future inspections of your activities.

Your cooperation with us is appreciated.

Sincerely,

Greg Yuhas, Chief
Reactor Radiological Protection Branch

bcc w/copy of letter dated 6/12/91:
Docket File
Project Inspector
Resident Inspector
A. Johnson
G. Cook
B. Faulkenberry
J. Martin
J. Zollicoffer
M. Smith (w/o letter)

REGION V/dot
DChaney /for GYuhas
7/11 /91 7/12/91

REQUEST COPY		REQUEST COPY		REQUEST COPY		REQUEST COPY		REQUEST COPY	
YES	NO	YES	NO	YES	NO	YES	NO	YES	NO

SEND TO PDR
YES NO

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Q PDR

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NRC
REGION V

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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June 12, 1991
GO2-91-121

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, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 91-10
RESPONSE TO NOTICES OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notices of Violation contained in your letter dated May 15, 1991. 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, the violations are addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
PL Eng - NRR
DL Williams - BPA/399
NRC Site Inspector - 901A

APPENDIX A

During an NRC inspection conducted 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)

Validity of Violation

The Supply System acknowledges the validity of this violation. Although flashing yellow lights and radiological barrier rope were installed, the areas noted were not posted as required. This condition existed for approximately 30 minutes. The reason for the violation was Lack of Attention/Concentration. Personnel had recently completed installation of temporary shielding in the drywell portion of containment and Plant Health Physics Technicians were in the process of re-posting the area. In this particular situation, a Contractor Health Physics Technician inadvertently removed the existing posting without ensuring that a High-High Radiation Area sign was posted at the equipment hatch entrance to the drywell.

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was Work Practices Less Than Adequate. Plant Health Physics Technicians failed to verify that the Iodine Sorbent Canister (GMR-I) shelf-life had not expired prior to issue on April 17, 1991 as required by procedure. The labels on the canisters noted that the units had to be used prior to April, 1991. Although the out-of-date canisters were issued to Plant personnel, they were not actually used during reactor vessel head removal efforts.

Corrective Steps Taken/Results Achieved

1. The canisters with the expired expiration date were immediately removed from the work area and replacement GMR-I canisters, with an expiration date of August, 1992, were issued. In addition, all GMR-I canisters in storage with the April, 1991 expiration date, and those which were near expiration (within two months), were removed from the site.

2. Plant Health Physics personnel involved were counselled on expectations pertaining to procedural compliance and a letter was issued to Health Physics Area Coordinators emphasizing the requirement to verify that GMR-I canister shelf-life has not expired.

Corrective Action to be Taken

On an annual basis prior to the onset of maintenance and refueling outages, Plant Health Physics personnel will verify that the shelf-life for the GMR-I canisters is within useful life limitation requirements.

Date of Full Compliance

Full compliance was achieved on April 17, 1991 when the out-of-date GMR-I Iodine Sorbent Canisters were removed from the work area and the replacement canisters were issued.

Corrective Steps Taken/Results Achieved

1. The equipment hatch entrance to the drywell was immediately posted as a High-High Radiation Area as required.

2. The individual involved was counselled on performance expectations, and also of the posting requirements contained in Plant procedures.

3. This violation and posting requirements were discussed with Health Physics Technicians in a staff meeting. Personnel were also reminded that, in addition to radiological barrier rope and a flashing yellow light, the drywell equipment hatch area shall be conspicuously posted with signs stating, "High-High Radiation Area" and, "Health Physics Escort Required For Entry."

Corrective Action to be Taken

No further corrective action is planned.

Date of Full Compliance

Full compliance was achieved on April 15, 1991 when the equipment hatch entrance to the drywell was properly posted.

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)