



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

DEC 28 1992

Docket 50-397
License NPF-21
EA 92-254

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

Attention: Mr. A. L. Oxsen, Acting Managing Director

SUBJECT: NRC INSPECTION REPORT 50-397/92-41

During the period of November 30 - December 21, 1992, Mr. L. Carson, Mr. L. Coblentz, and Mr. M. Cillis of this office conducted a routine inspection of activities authorized for your Washington Nuclear Project 2 (WNP-2). On December 10, 1992, Mr. F. Wenslawski of this office joined Mr. Coblentz and Mr. Cillis in a discussion of our preliminary findings with members of your staff identified in the enclosed report. On December 21, 1992, Mr. Wenslawski, Mr. Coblentz, Mr. Carson, and Mr. J. Reese of this office discussed the remainder of our inspection findings with members of plant management in a conference call.

Areas examined during this inspection are described in the enclosed report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations of activities in progress.

Based on the results of this inspection, seven apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C. The violations involve: (1) excessive radiation levels on a radioactive waste shipment; (2) an inadequate survey for waste classification; (3) unauthorized disposal of radioactive cooling tower sludge; (4) failure to evaluate operation of the service air system as contaminated; (5) unauthorized temporary modifications to the service air system; (6) failure to follow procedures for personnel radiation protection; and (7) failure to follow procedures for implementation of the process control program. Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

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Your programs for controlling personnel radiation exposure are a matter of concern, based on the number and range of personnel performance issues related to compliance with radiation protection procedures. In two instances, your workers deliberately violated radiation protection controls. In other cases, the number and recurring nature of the discrepancies suggests a general carelessness among both workers and supervision, for the importance of radiation protection procedure compliance. While the individual instances are not radiologically significant, your tolerance of a climate in which workers casually circumvent radiation protection controls could quickly lead to incidents of more serious radiological consequence.

Finally, in a broader sense, we are concerned because of the overall lack of timely and effective corrective action that appears to characterize your response to radiation protection deficiencies. Several of these apparent violations are conditions that you have identified in the past, and we expect that you will address the lack of management involvement that has allowed these problems to persist. The apparent violation of Department of Transportation package radiation limits, as it relates to previously identified weaknesses in this area, is also illustrative of this overall lack of timely and effective corrective action.

An enforcement conference to discuss these apparent violations has been scheduled for January 12, 1993. This enforcement conference will be open to public observation in accordance with the Commission's trial program as discussed in the enclosed Federal Register notice (Enclosure 2). The purposes of this conference are:

- (1) to discuss the apparent violations, their causes, and their safety significance;
- (2) to provide you the opportunity to point out any errors in our inspection report; and
- (3) to provide an opportunity to present your proposed corrective actions.

Regarding the apparent violation for an inadequate waste classification survey, we ask specifically that you would be prepared: (1) to explain the lack of attention to detail and/or lack of training exhibited by the individuals who calculated the waste classification, (2) to explain your survey-based justification for continuing to classify the liner in question as Class B waste, and (3) to offer detailed information as to how many shipments within the past two years have been classified in this manner.

In addition, this is an opportunity for you to provide any information concerning your perspective on (1) the severity of the issues, (2) the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and (3) the possible basis for exercising discretion in accordance with Section VII of the Enforcement Policy.



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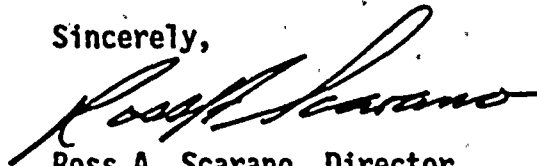


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You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violations is required at this time.

In accordance with 10 CFR 2.790(a) of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,



Ross A. Scarano, Director
Division of Radiation Safety
& Safeguards

Enclosure: Inspection Report 50-397/92-41

cc w/enclosure:

Mr. J. W. Baker, WNP-2 Plant Manager
Mr. A. G. Hosler, WNP-2 Licensing Manager
Mr. J. C. Gearhart, Director, Quality Assurance
Mr. G. E. Doupe, Esq., WPPSS
Mr. J. V. Parrish, Assistant Managing Director for Operations
Mr. A. Lee Oxsen, Acting Managing Director
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Mr. M. H. Philips, Esq.



21

