

NOTICE OF VIOLATION

American Electric Power Service
Corporation

Docket No. 50-315
Docket No. 50-316

As a result of the inspection conducted during the period July 16 through August 31, 1987, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the following violations were identified:

1. 10 CFR 71.5 prohibits transport of any licensed material outside the confines of a plant or other places of use or delivery of licensed material to a carrier for transport unless the licensee complies with applicable regulations of the Department of Transportation in 49 CFR Parts 170-189.

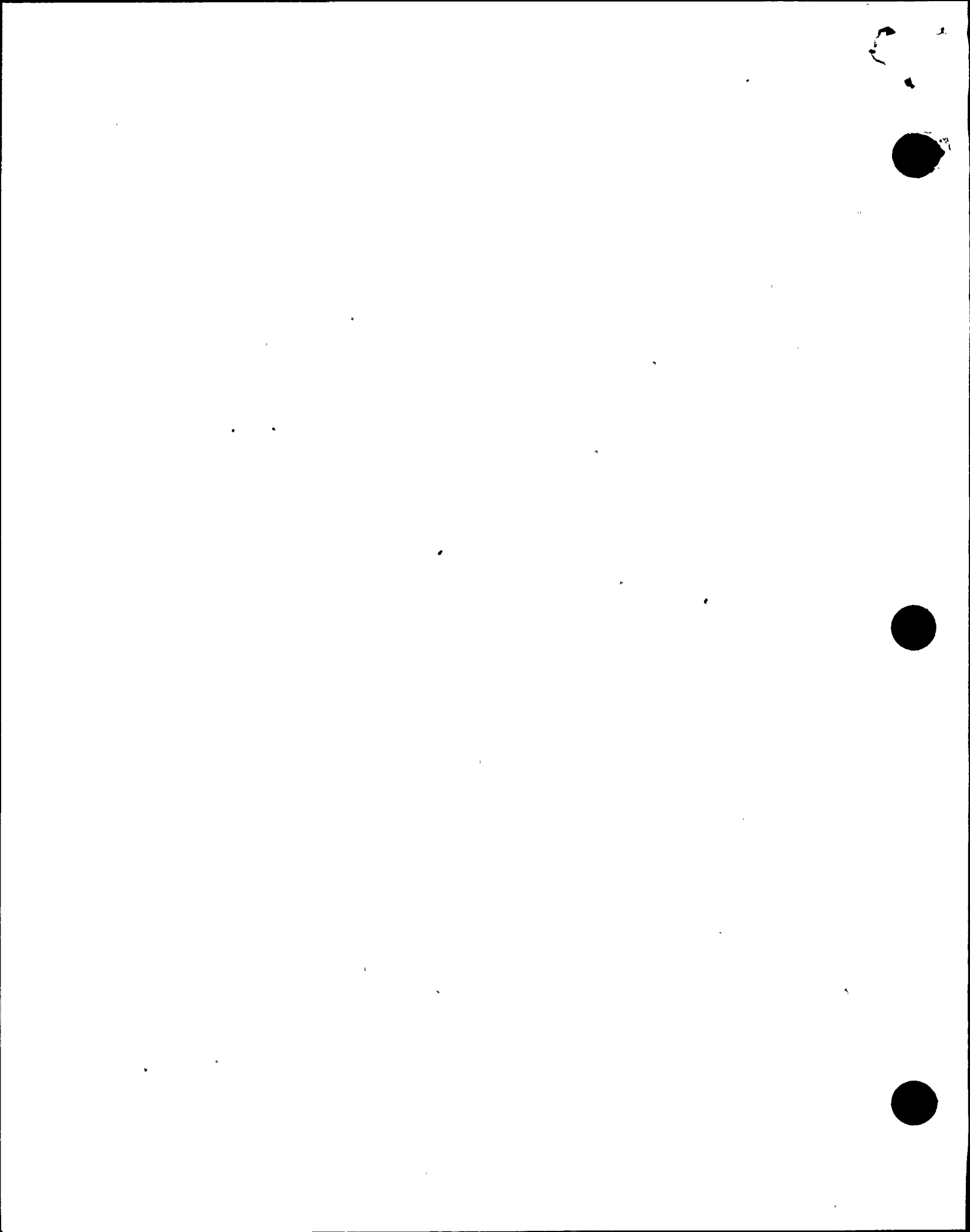
49 CFR 172.403(b) requires that a Yellow-III label be affixed to packages of radioactive material if the transportation index is greater than 1.0. 49 CFR 173.403(bb)(1) defines the transportation index as the number expressing the maximum radiation level in millirem per hour at one meter (3.3 feet) from the surface of the package.

Contrary to the above, on October 22, 1986, at the Barnwell waste burial facility, a State of South Carolina inspector found that exclusive use radioactive waste shipment No. 1086-248-A, classified as Radioactive Material, n.o.s., and transported from D.C. Cook to Barnwell in a HN-200 shipping cask, was improperly labeled as Yellow-II in that the radiation survey conducted by the state inspector determined a transportation index of 1.5.

This is a Severity Level IV violation (Supplement V).

2. Technical Specification 6.8.1.a requires adherence to the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. Section G.5.e of the aforementioned Appendix A requires radiation work permit procedures. Procedure No. 12 THP 6010.RAD.406, Radiation Work Permit, requires individual workers to properly wear anti-contamination clothing as specified by radiation work permits.
 - a. Contrary to the above, on July 20, 1987, during an inspection tour of the auxiliary building, an inspector observed two workers performing activities governed by the restrictions of Radiation Work Permit No. 0030, Wet Laundry Facility, were not wearing taped hoods as required by the radiation work permit.

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- b. Contrary to the above, on July 21, 1987, during an inspection tour of the Unit 1 containment, an inspector observed three workers performing activities governed by the restrictions of Radiation Work Permit No. 0493, Reactor Head Stud Tasks, were not wearing beta shields as required by the radiation work permit.

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

3. 10 CFR 20.201(b) states that each licensee shall make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations of this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

As used in the regulations in this part, "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present.

Procedures No. 12 THP 6010.RAD.404, Establishing Posted Areas, and No. 12 THP 6010.RAD.200, Routine Radiation and Contaminated Surveys and Establishing Posted Areas, require any area in which the removable contamination on any accessible surface or equipment exceeds 500 dpm/100 cm² beta-gamma to be posted as a contamination area.

Contrary to the above, the licensee failed to adequately evaluate removable contamination levels on equipment to ensure compliance with 10 CFR 20.101(a) and 10 CFR 20.103(a) in that the inspectors or the licensee found the following equipment with removable contamination greater than 500 dpm/100 cm² beta-gamma located outside designated contamination areas in the auxiliary building:

- a. On March 10, 1987, three chain falls with removable contamination of about 6000, 3000, and 1400 dpm/100 cm² beta-gamma, respectively, were issued for use from the hot tool crib on the 633-foot elevation to two workers. As a result of the failure to adequately survey the chain falls before issuance, the hands of both workers became contaminated.
- b. On March 18, 1987, a steam generator eddy current probe with removable contamination of about 350,000 dpm/100 cm² beta-gamma was found on the clean side of the 609-foot elevation decontamination/laydown area.
- c. On April 15, 1987, a steam generator tube marking tool with removable contamination of about 130,000 dpm/100 cm² was found near the 609-foot elevation decontamination/laydown area.

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- d. On July 20, 1987, a pressure gauge with removable contamination of about 1000 dpm/100 cm² was found on a cart adjacent to the 609-foot elevation decontamination/laydown area.

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

4. Technical Specification 6.11 requires adherence to radiation protection procedures. Radiation Protection Procedure No. 12 THP 6010.RAD.741, Termination Exposure Reporting, requires that the termination letter log be properly maintained, and specifies that TLD badges be sent to the vendor for readout within one week from termination notification, that TLD badges be promptly processed, and that the results be promptly transmitted to the licensee.

Contrary to the above, a selective review of the termination letter log from March through September 1986 found that the termination letter log was not properly maintained in that more than 100 incorrect log entries were found regarding the dates of termination: TLDs sent to the vendor for readout, TLD results received by the licensee, and the 10 CFR 20.408 termination exposure report required issuance. Additionally more than 100 log entries showed that TLD badges were sent to the vendor for readout more than seven days after the termination date, and about 100 log entries showed that the TLD badges were not being processed and reported to the licensee promptly by the vendor in that the period of time between sending the TLDs to the vendor and the receipt of the TLD results by the licensee ranged from more than two weeks to about two months.

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

5. 10 CFR 20.408(b) requires a report of individuals' radiation exposures, incurred during the period of employment or work assignment in the licensee's facility, be furnished to the NRC within 30 days after the exposure of the individual has been determined by the licensee or 90 days after the date of termination of employment or work assignment, whichever is earlier.

Contrary to the above, more than 600 termination letter log entries showed that the required termination exposure reports were issued more than 30 days after the TLD results were received by the licensee from the vendor, and the termination exposure reports on at least four individuals (who terminated employment on April 10 and 11, 1986), were furnished to the NRC 91 days after employment termination.

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

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With respect to Item No. 1, the inspection showed that action had been taken to correct the identified violation and to prevent recurrence. Consequently, no reply to the violation is required and we have no further questions regarding this matter. With respect to Items No. 2 through No. 5, pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

OCT 23 1987

Dated _____

for W.D. Shopes

Jack A. Hind, Director
Division of Radiation Safety
and Safeguards

