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RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC ltr re violations noted in insp repts 50-220/92-17 & 50-410/92-19 on 920625.Corrective actions: area Coordinators will be responsible for achieving established radiological performance goals.

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B. Ralph Sylvia
Executive Vice President
Nuclear

July 27, 1992
NMP2L 1349

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

SUBJECT: RESPONSE TO NOTICE OF VIOLATION - NRC COMBINED INSPECTION REPORT NOS. 50-220/92-17 AND 50-410/92-19

Attached is Niagara Mohawk Power Corporation's response to the Notice of Violation contained in the subject Inspection Report dated June 25, 1992. We feel that our corrective actions have appropriately addressed the cause in order to prevent recurrence of this violation. If you have any questions concerning this matter, please contact me.

Very truly yours,

B. Ralph Sylvia
Exec. Vice President-Nuclear

JTP/sek
002623LL
attachments

xc: Mr. T. T. Martin, Regional Administrator, Region I
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. R. A. Capra, Director, NRR
Mr. J. E. Menning, Project Manager, NRR
Mr. L. E. Nicholson, Chief, Reactor Projects, Section 1B
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NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT UNIT 2
DOCKET NO. 50-410
NPF-69

RESPONSE TO NOTICE OF VIOLATION CONTAINED IN INSPECTION REPORT 50-220/92-17 AND 50-410/92-19

VIOLATION 50-410/92-19

Title 10, Code of Federal Regulations (CFR), Part 50.36 requires, in part, that licensees operate their facilities in accordance with plant Technical Specifications. Plant Technical Specification 6.11 requires in part that procedures for radiation protection be established and adhered to for all operations involving personnel radiation exposure. The licensee's radiation safety manual requires, in part, that workers who enter a radiation controlled area utilizing a Radiation Work Permit (RWP) must comply with all provisions of the RWP. RWP 925052, established for work to be conducted on the refueling floor and reactor cavity on May 19, 1992 required in part that Radiation Protection be notified prior to any wire brushing, and that workers entering the reactor cavity utilize two sets of protective clothing and a full face respirator.

Contrary to the above, on May 19, 1992 contractor workers performed wire brushing in the reactor cavity, at the direction of a contractor supervisor, without first informing Radiation Protection, and without wearing the double set of protective clothing required by the RWP for entry to this area.

This is a Severity Level IV violation.

1. THE REASONS FOR THE VIOLATION

Niagara Mohawk Power Corporation admits to the violation.

On May 19, 1992, contractor workers were performing work in the reactor cavity under Radiation Work Permit (RWP) #925052. This RWP required, in part, the following for work in the cavity:

- That two sets of protective clothing and full face respirators be worn.
- That Radiation Protection be contacted prior to wire brushing.

1. THE REASONS FOR THE VIOLATION
(Continued)

At approximately 0130 hours, the Refuel Floor Radiation Protection (RP) Technician was informed by the foreman of the contractor group working on the reactor vessel stud protectors that wire brushing had begun on the reactor vessel studs. The RP Technician had not expected that wire brushing would be performed since the RP Chief Technician had limited work to removal of the stud protectors in order to permit the RP Technician to perform a survey on the studs prior to wire brushing. The RP Technician knew that the protective clothing for the cavity work prescribed by the RWP was appropriate to provide adequate protection for the workers in the cavity. Thus, after being notified that wire brushing had begun, his immediate concern was air sampling to verify the airborne concentration for personnel on the refuel floor who were not wearing respirators. As the RP technician was setting up the air sampler at the cavity edge, the refuel floor continuous air monitor alarmed due to the wire brushing activity, and the RP technician ordered an evacuation of all personnel from the refuel floor. As the RP technician assisted the workers exiting the cavity in removing their outer set of protective clothing, he was advised that one worker was wearing only one set of coveralls. This individual was found to be contaminated about the face, neck, chest, and right elbow.

Analysis of the air sample results showed a peak airborne radioactivity concentration of 63% of the Maximum Permissible Concentration (MPC) values of 10CFR20.

Later that evening (the next work day for the shift involved), an accountability meeting was held to discuss the event. In attendance were RP supervision, contractor supervision, and the worker who was doing the wire brushing on the reactor vessel studs without the required protective clothing. The contractor supervisor indicated that he had given direction to the worker to begin wire brushing the studs without having first contacted RP, as required by the RWP and the pre-job briefing with the RP Chief Technician. The worker admitted to wearing inappropriate protective clothing and to not having read the RWP.

Radiation Protection routinely performs reviews of radiological work practices using procedure S-RAP-RPP-0106, "Review of Radiological Work Practices". Since October 1, 1991, very few instances of RWP non-compliance have been noted. Quarterly Radiation Protection performs procedure S-RAP-RPP-0108, "Radiation Protection Self Assessment". They have not identified any trends of RWP non-compliance. These reviews include contractors as well as Niagara Mohawk employees. Therefore, this instance of RWP non-compliance is deemed not to be programmatic.

Thus, the cause of this event was determined to be personnel error. The supervisor failed to follow the direction of the RP Chief Technician by instructing the worker to go ahead and perform the wire brushing and the worker failed to read, understand and comply with RWP requirements.

2. CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

Immediate corrective actions in response to this event were:

- Restricting access to the refuel floor until radiological surveys were performed, postings and entry requirements updated, and areas decontaminated.

- Decontaminating the individual who was found to be contaminated about his face, neck, chest, and right elbow. A Contamination Occurrence Report (COR) was written for this person. The contamination level was below the criteria for performing a skin dose calculation.

- Providing a whole body count for the contaminated worker and his co-worker. Based on the results, the worker was assigned an internal intake of approximately two Maximum Permissible Concentration - hours (MPC-hrs.) due to Zinc-65. The co-worker had detectable but an insignificant radioactivity level due to Zinc-65.

- Holding an accountability meeting to determine the cause of not following the procedure. The responsibilities of workers, foremen and supervision with respect to proper notification to RP of specific work to be performed and observance of RWP and RP directives were reviewed with all present.

3. CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Corrective actions to be taken are:

- Area Coordinators assigned to key radiological areas during the next refuel outage will be responsible for achieving established radiological performance goals for their respective areas. These goals will include worker's radiological performance.

- Selected contracts involving extensive work in radiological areas will receive review and approval by Radiation Protection Branch Managers before issuance, to establish the need for penalty clauses and/or other measures as appropriate with respect to contract worker radiological performance.

- Access control to key radiological areas will be increased during the next refuel outage. These areas will be included in the Refuel Outage #3 Pre-Outage ALARA checklist based on radiological risk. An access control person for these key areas will assist workers by verifying their understanding and compliance with RWP requirements.

- This event will be discussed in General Employee Training, with emphasis placed on the significance of this event and radiation worker accountability.

3. CORRECTIVE ACTIONS TO BE TAKEN TO AVOID FURTHER VIOLATIONS *(Continued)*

- Employees and contractors who do not follow radiation protection rules will not be allowed to regain access to the restricted area until they fully understand the radiation protection requirements and corrective actions are taken that are acceptable to the Radiation Protection Manager and the responsible manager of that work group.

4. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on May 19, 1992 when it was established that all workers had evacuated the area, and signed off the RWP, workers from the reactor cavity were found to be within regulatory limits following whole body count surveys, and access to the refuel floor was restored to normal.