

Appendix B

NOTICE OF VIOLATION

Consumers Power Company

License No. DPR-20

Based on the Health Physics Appraisal conducted August 4-15, 1980, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. Items 1 and 2 are infractions. (Section references are to the Details portion of the enclosed report.)

1. 10 CFR 20.201(b) requires evaluations as necessary to comply with regulations for the release of radioactive effluents to unrestricted areas.

Contrary to the above, the licensee did not perform a timely evaluation of an airborne release of radioactive material which occurred on August 12, 1980. The release was not quantified until about fourteen hours after the event. (Section 11.a)

2. Technical Specification 6.11.1 requires adherence to radiation protection procedures. The following instances of failure to meet this requirement were identified during the appraisal.

- a. Procedure HP 1.1.5.2.3 requires that personnel leaving a restricted area check for contamination by passing through a portal monitor or by monitoring themselves with a frisker instrument.

Contrary to the above, the Appraisal Team observed several individuals fail to check for contamination when leaving restricted areas. (Section 8.a)

- b. Procedure HP 2.16 specifies that the Plant Health Physicist or Radiation Protection Supervisor, or in their absence the Shift Supervisor, must approve entries into areas over 1000 mR/hr.

Contrary to the above, the authorizing individual on most High Radiation Area Entry Permits (Form HP 2.16.1) reviewed was a C&RP technician. (Section 8.a)

- c. Procedures HP 2.12 and HP 2.17 require that pipes, valves, or other equipment with radiation levels greater than twice the general area levels, and exceeding 75 mR/hr, be tagged with hot spot tags.

Contrary to the above, several unposted hot spots were identified in the primary system drain pump room. (Section 8.a)

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- d. Procedure₂HP 2.17 requires that areas with greater than 400 dpm/100cm² loose contamination be posted as contaminated areas.

Contrary to the above, the clean resin room was not posted as a contaminated area,₂ although contamination levels were greater than 400 dpm/100cm² according to licensee surveys. (Section 8.a)

- e. Procedure HP 2.8 requires an operating check of the Eberline PIC-6A, using an eight microcurie cesium-137 source mounted on a table at Access Control.

Contrary to the above, no such check source was located at Access Control. According to licensee personnel, source checks are not routinely performed before instrument use. (Section 9.a)

- f. Procedures HP 2.40 and HP 2.41 require the labeling of Ludlum 177 and Eberline RM-14 instruments, respectively, with the response to a 0.5 microcurie cesium-137 check source for reference on daily checks of the instrument.

Contrary to the above, several such instruments were not labeled with their check source response. (Section 9.b)