

APPENDIX A

NOTICE OF VIOLATION

Yankee Atomic Electric Company

Docket No. 50-29

Based on the results of an NRC inspection conducted on November 6-8, 1978, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. Items A, C, and E are infractions and items B and D are deficiencies.

- A. 10 CFR 20.101(a), "Exposure of individuals to radiation in restricted areas," limits the whole body dose to any individual in restricted areas to 1 1/4 rems in any calendar quarter except as provided by 10 CFR 20.101(b), which allows a whole body dose up to 3 rems per calendar quarter provided certain specified conditions are met. One of these conditions is that the licensee has determined the individual's accumulated occupational dose to the whole body on Form NRC-4 or on a clear and legible record containing all of the information required on that form.

Contrary to the above requirements, without determining their accumulated occupational whole body doses in the prescribed manner;

1. Two individuals each were given permission to receive up to a 2 rem whole body dose in restricted areas during the fourth calendar quarter of 1978, and;
 2. By the date of the inspection, one of these individuals had received 1.687 rem whole body dose in restricted areas during the fourth calendar quarter of 1978 as shown by the TRAP computer record system update for November 6, 1978.
- B. 10 CFR 20.401 "Records of surveys, radiation monitoring, and disposal" requires in section (a) that each licensee maintain records showing the radiation exposures of all individuals for whom personnel monitoring is required under 10 CFR 20.202, on Form NRC-5 in accordance with the instructions contained on that form or on a clear and legible record containing all of the information required by Form NRC-5. YAEC retains the Form NRC-5 information in the TRAP computer record system, documented in a letter dated January 23, 1978, and approved by NRC in a letter dated February 18, 1978.

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Contrary to the above requirements, 1.22 rem of the prior whole body dose received in restricted areas during 1978 was omitted from the Form NRC-5 information in the TRAP system for an individual who received 1.529 rem whole body dose on site between October 21 and November 4, 1978. Specifically the information required in items 6, 8 through 16, and 18 of Form NRC-5 was incorrect.

- C. 10 CFR 20.203, "Caution signs, labels, signals, and controls," requires in (b) that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words, "Caution, Radiation Area." 10 CFR 20.202 section (a)(2) defines a "Radiation Area" as any area, accessible to personnel, in which there exists radiation, originating in whole or in part within licensed material, at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirem.

Contrary to the above, on November 6, 1978, two areas near 4 ft x 8 ft containers of radwaste located outdoors were unattended and were not posted as radiation areas. One area was below the containment, near the elevator. The other area was near the waste compactor. The radiation levels were in excess of 20 mrem/hr at a distance of 12 inches from these containers.

- D. Technical Specification 6.10.2, "Record Retention," requires, in part, that the records of training and qualification for current members of the plant staff shall be retained for the duration of the Facility Operating License.

Contrary to the above, the training record required by Procedure No. AP9000 was not retained for one individual who worked on site from October 21 to November 4, 1978, in restricted areas where he received a 1.529 rem dose to the whole body, and training was required before performing work in these areas.

- E. Technical Specification 6.11, "Radiation Protection Program," requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposures. Procedure No. OP8415 "Radiation Work Permits" states in part that personnel will not deviate from instructions on the work permit.

Contrary to the above, a condition of radiation work permit, RWP No. 935, that gloves be worn on this job was not adhered to resulting in an individual working bare-handed on a pipe that was smeared at 200,000 dpm, on November 6, 1978. This individual received contamination on his hands, requiring his temporary removal from the job.