

Appendix A

NOTICE OF VIOLATION

Dairyland Power Cooperative

Docket No. 50-409

As a result of the inspection conducted during the months of December, 1980 and January, 1981; and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

1. LACBWR Technical Specification 4.2.19 requires all penetration fire barriers protecting safety related areas to be functional at all times. If one or more of these fire barriers protecting safety related areas become nonfunctional, the area is to be protected by operable fire detection instrumentation and inspected by a fire watch patrol at least once per hour within one hour.

Contrary to the above on December 2 and 3, 1980, during a refueling outage, with the reactor empty of all fuel, five (5) holes were drilled through fire barriers in the Turbine Building without establishing the necessary fire watch patrol as required by the above requirement. It should be also noted that the Operations Review Committee review of the facility change that necessitated drilling the holes did not identify this obvious Violation of Technical Specification.

This is a Severity Level V violation (Supplement 1.E).

2. 10 CFR, Part 20, Section 20.203 states, in part:

".....(c)(2) Each entrance or access point to a high radiation area shall be:.....(ii) Equipped with a control device which shall energize a conspicuous visible or audible alarm signal in such a manner that the individual entering the high radiation area and the licensee or a supervisor of the activity are made aware of the entry; or (iii) Maintained locked except during periods when access to the area is required, with positive control over each entry."

LACBWR Technical Specification 3.8.1 states:

"Written procedures and administrative policies shall be established, implemented and maintained...."

LACBWR Technical Specification 3.11 states:

"Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR, Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

LACBWR Technical Specification 3.13.1 states:

"In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:

Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a special Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area."

LACBWR Operating Manual, Volume E, section 2.7(2) states in part:

" ..(a) Anyone entering a high radiation area is required to notify the Control Room, prior to entering and exiting a "High Radiation Area" or immediately after exiting the area if communications are impossible from within the area....(c) Operations is required to check out any entry alarms where the Control Room is notified prior to entries into "High Radiation Areas,"...."

LACBWR Operating Manual, Volume X, section 6.5.3 states in part:  
(7) Reverse Page - Each worker assigned to the SWP will complete the required information for each entry into the work area on the entry copy of the SWP.

Contrary to the above:

1. The Resident Inspectors noted on January 6, 1981 that two LACBWR maintenance personnel assigned to perform work associated with a Special Work Permit (SWP).
  - a. Failed to notify the Control Room Operator prior to entering and exiting a "High Radiation Area" on numerous entries/exits.
  - b. Failed to replace the radiological control barrier when exiting.
  - c. Failed to complete the required information on the reverse side of the SWP when entering and exiting the work area.
  - d. Failed to utilize the radiation monitoring device provided for continuously indicating the dose rate in the area.

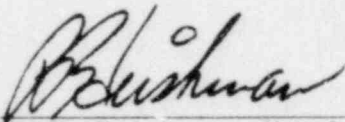
Note: It was also noted the instrument did not have a calibration sticker.

2. The Resident Inspectors noted on January 6, 1981 that the Control Room Operator failed to check out or have checked out entry alarms received in the control room for entries into the full-flow demineralizer area of the turbine building and had not been notified in advance prior to entry into the area.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated February 17, 1981

  
\_\_\_\_\_  
R. F. Heishman, Chief  
Reactor Operations and  
Nuclear Support Branch