

APPENDIX A

NOTICE OF VIOLATION

Pacific Gas and Electric Company
Humboldt Bay Unit 3

Docket No. 50-133

As a result of the inspection conducted on January 5-8, 1982 it appears that several violations of NRC requirements and license conditions have occurred as noted in Items A-C below. The inspection focused on radiation protection activities, as appropriate, considering the extended shutdown of the facility and inventory of radioactive materials presently on site. Failure to maintain the qualifications of individuals in radiation protection procedures, failure to maintain the radiation protection procedures consistent with the requirements of 10 CFR Part 20, and failure to maintain the operability of a high radiation area control device appear to indicate a lack of attention to radiation protection activities which could be conducive to more serious violations of NRC requirements.

In accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 20.203(c)(2)(ii) states in part that: "Each entrance or access point to a high radiation area shall be: ---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;" unless some other provision or exemption to this part of the regulation applies.

Contrary to this requirement, on January 6, 1982 when entering the high radiation area at the -66 ft elevation to the drywell through the accordion gate the conspicuous visible or audible alarm signal did not energize due to a mechanical obstruction of the activation switch arm. No other provision or exemptions to this aspect of high radiation area control applied.

The whole body dose rate in this area near the lower drywell head was measured to be 400 mrem/hr.

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

- B. Technical Specifications, Appendix A, Administrative Controls, Plant Organization, Item C.1.e states: "The Shift Foreman or another individual qualified in radiation protection procedures shall be on-site when fuel is in the reactor."

Contrary to this requirement, on January 5, 1982 between 5 and 7 PM neither the Shift Foreman nor any other individual onsite was qualified in radiation protection procedures and fuel was in the reactor. Specifically, the Shift Foreman and two licensed operators were unable to perform surveys of airborne radioactive materials and determine beta dose rates using their portable radiation survey instruments.

This is a Severity Level V Violation (Supplement 1).

- C. Technical Specifications, Appendix A, Administrative Controls, Item K. Radiation Protection Program states: "Radiation control procedures shall be maintained and made available to all plant personnel. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. The radiation protection program shall be organized to meet the requirements of 10 CFR 20." 10 CFR 20.102 "Determination of prior dose." effective August 20, 1979 states in Paragraph (a) that: "Each licensee shall require any individual, prior to first entry of the individual into the licensee's restricted area during each employment or work assignment under such circumstances that the individual will receive or is likely to receive in any period of one calendar quarter an occupational dose in excess of 25 percent of the applicable standards specified in § 20.101(a) and § 20.104(a), to disclose in a written, signed statement, either: (1) That the individual had no prior occupational dose during the current calendar quarter, or (2) the nature and amount of any occupational dose which the individual may have received during that specifically identified current calendar quarter from sources of radiation possessed or controlled by other persons. Each licensee shall maintain records of such statements until the Commission authorizes their disposition."

Contrary to this requirement, as of January 6, 1982 Radiation Control Standard No. 1, "Personnel Exposure" Revision 44, dated September 1981 and Radiation Control Procedure No. 1A, "Personnel External Exposure Dosimetry and Control" Revision 34, dated January 1980 permit an occupational radiation worker to receive a dose in excess of 25 percent of the applicable standards specified in 10 CFR 20.101(a) without first making the determination of prior dose as required by 10 CFR 20.102. This inconsistency was previously brought to the licensee's attention and documented in NRC Inspection Report No. 80-04.

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

Pursuant to the provisions of 10 CFR 2.201, Pacific Gas and Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply to Items A and C including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. No written response to Item B is required in view of the Plant Superintendent's actions taken during the inspection which adequately addressed questions (1) (2) and (3). Consideration may be given to extending your response time for good cause shown.

The response directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

dated FEB 1 1982

G. P. Yuhas, Radiation Specialist