

POWER AUTHORITY OF THE STATE OF NEW YORK  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT



CORBIN A. McNEILL, JR.  
Resident Manager

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February 18, 1982  
SERIAL: JAFP 82-0172

Richard W. Starostecki, Director  
Division of Resident & Project Inspection  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA. 19406

SUBJECT: INSPECTION 50-333/81-27

Dear Mr. Starostecki:

With reference to the inspection conducted by Mr. J. Linville of your office on December 1-31, 1981, at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated January 20, 1982, as received by the undersigned on January 25, 1982.

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted on December 1-31, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specification 6.8(A) requires that written procedures be implemented that meet or exceed the requirements and recommendations of Section 5, "Facility Administrative Policies and Procedures," of ANSI 18.7-1972 and Appendix A of Regulatory Guide 1.33, November 1972. Work Activities Control Procedure 10.1.3, "Placement of Jumpers/Blocks or Lifted Leads," Revision 3, dated May 13, 1981, paragraph 7.2.1 requires that the person applying the jumper/block/lifted lead ensure that a tag is attached and is signed.

Contrary to the above, at about 1:15 p.m. on December 10, 1981, the inspector observed blocks inserted between the contacts of the pump trip level switches on the laundry drain tank level recorder without any tags or log sheet.

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

- B. Technical Specification 6.11(A)2 requires that locked doors be provided to prevent unauthorized entry into high radiation areas in which the intensity of radiation is greater than 1000 mrem/hr. and that the keys be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Radiation Protection and Radiochemistry Supervisor.

Contrary to the above, at about 10:00 a.m. on December 11, 1981, the inspector observed that gate number RW 272/12 was tied open with no one controlling access to the area and the keys for this gate are not under direct administrative control of the Shift Supervisor on duty and/or the Plant Radiation Protection and Radiochemistry Supervisor. Licensee survey number 44303 completed at 1105 on December 12, 1981 during which the inspector accompanied the Radiation Protection technician, indicates that portions of the area made accessible by open gate RW 272/12 had radiation levels up to 3000 mrem/hr. general area.

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

- C. Technical Specification 6.11, "Radiation Protection Program" requires that procedures for personnel radiation protection shall be prepared consistent with the requirement of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure. Section II.B of the Radiation Protection Operating Procedures (RPOP), requires that Radiation Work Permits (RWP) be issued for jobs where special hazards are involved such as grinding on contaminated surfaces. In addition, Section II.B.6.2 of the RPOP states that the leadman is responsible for personnel working under the RWP and ensures that they obey its instructions.

Contrary to the above, the leadmen did not ensure the RWP instructions to obtain air samples during grinding operations were obeyed as required by RWP's 7943S and 8092S on December 14 and RWP 8414S on December 19, 1981.

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

- D. Technical Specification 6.4 requires that Fire Brigade training sessions be held at least quarterly.

Indoctrination and Training Procedure No. 13, "Fire Protection Training", Revision 2, dated February 1981, requires that each fire brigade perform a shift drill or exercise at least quarterly.

Contrary to the above, during the first three quarters of 1981, the licensee failed to conduct all required quarterly drills for each fire brigade. A review of selected individual training records and drill muster sheets indicated the licensee has no program to ensure the operations and security personnel who make up the fire brigades and are on different rotating shifts are trained, since only seventeen of thirty-nine fire brigade members performed all three quarterly drills.

This is a Severity Level VI Violation (Supplement I).

RESPONSE TO  
NOTICE OF VIOLATION

- A. The improperly inserted blocks were removed and the system was restored to normal. This action resulted in the plant being in full compliance with respect to this item on December 11, 1981.

To prevent recurrence, the personnel involved were instructed with respect to the requirements of WACP 10.1.3 and an entry was made in the Operations Department Night Orders reminding personnel of the requirements with respect to jumpers, blocks or lifted leads. Further, specific training in the requirements of WACP 10.1.3 will be incorporated into the Operator Retraining Program.

- B. As noted in the inspection details, the inspector closed the gate when he left the area and informed plant personnel of the action he had taken. This resulted in the plant being in full compliance with respect to this item on December 11, 1981.

The FitzPatrick Plant acknowledges that gate RW 272/12 on several occasions, has not been properly closed as required. To correct this problem and to prevent further recurrence, the wire mesh fences and gates utilized for controlling access to certain portions of the radwaste building have been rearranged to simplify control of access and reduce the frequency that gates associated with high radiation areas of more than 1000 mrem/hour must be opened. This gate and fence rearrangement was completed by February 10, 1982.

Subsequent to receipt of the subject inspection report, the Resident Inspector also called to the attention of the plant staff, a problem concerning the proper barricading of waste material which has been packaged for shipment but has not yet been transported. This problem primarily concerns the proper barricading and labelling of temporary radiation and high radiation areas that are created by the existence of the shipping containers awaiting transportation. Since waste solidification utilizing cement will require curing of the mixture prior to transportation, additional instances of shipping containers awaiting transportation will occur. To prevent problems with proper barricading of the waste containers, the use of ropes and tags will be discontinued when practical. A fenced area will be utilized for the storage and will be installed prior to the next cement solidified waste shipment or the shipping containers will be temporarily stored within existing structures which permit effective access control.

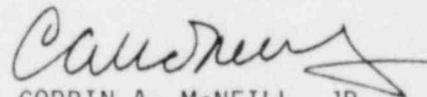
- C. This item was discussed with the leadman involved and radiation protection technicians were verbally instructed to more closely follow the activities authorized or required by radiation work permits. This action resulted in the FitzPatrick Plant being in full compliance on December 21, 1981.

To prevent recurrence, the Radiological and Environmental Services Department is developing a "Radiation Protection Incident Report" system in order to document minor radiation protection incidents and to provide a mechanism to feed back information concerning the incidents into radiation protection training programs. It is expected that the Radiation Protection Incident Report system will be fully implemented by June 30, 1982.

- D. The FitzPatrick Plant has initiated a program of additional fire drills so that each fire brigade member will be subjected to a drill twice each calendar year. On February 16, 1982, the sixth drill of the calendar quarter was held. This action brought the plant into full compliance with respect to this item.

In addition to scheduling six (6) drills in each quarter of each year, an internal monitoring system will be implemented to identify those individuals that are potential fire brigade members and have not participated in at least two drills during the year. Based on the results of this monitoring, additional drills or training exercises will be scheduled so that each potential fire brigade member receives the required training.

Very truly yours,



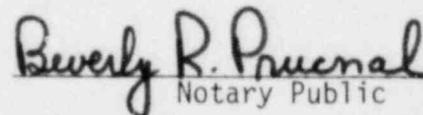
CORBIN A. McNEILL, JR.  
RESIDENT MANAGER

CAM:VC:brp

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Subscribed and Sworn to before  
me this 18th day of February, 1982

  
Notary Public

**BEVERLY R. PRUCNAL, #4628499**  
Notary Public - State of New York  
Appointed in Oswego County  
My Commission Expires March 30, 1982