

YANKEE ATOMIC ELECTRIC COMPANY

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January 25, 1994
BYR 94-004

Director, Office of Enforcement
United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) Letter, USNRC to YAEC, dated December 28, 1993

Subject: Reply to Notice of Violation

Dear Sir:

During an NRC inspection tour of the site Radiological Control Area on August 26, 1993, a violation of NRC requirements was identified. Reference (b), Inspection Report No. 50-29/93-07, documents the results of this inspection.

In accordance with 10 CFR 2.201, we hereby submit the following information describing the conditions which led to the violation and the remedial actions taken to correct and prevent recurrence of this condition.

Violation

Technical Specifications (TS) 6.11.1. states, in part, that "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 1000 mrem/hour or less shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Contrary to the above, on August 26, 1993, the inspector found several examples of high radiation areas where the licensee did not barricade or properly control access to prevent inadvertent entry. The high radiation areas without proper access controls were found in the containment vessel on the upper steam generator platforms at the entrance to the lower portion of the steam generator cubicles. The duration of these conditions prior to August 26, 1993 was indeterminable.

Response:

We concur with the Notice of Violation as described above and in Reference (b). On August 26, 1993, work was in progress to remove asbestos from the four steam

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generators in preparation for their removal and shipment off-site. Platforms had been erected to facilitate access to the steam generator cubicles. It was discovered that ladders providing access to these cubicles from the top platform did not have a proper barrier. The barriers had a hatch door that opened to allow access via a ladder to the lower areas in the steam generator cubicles. The ladders protruded up through the platform approximately four feet and were posted with a "high radiation area-caution" sign at the top of the ladder. When the hatch doors were left open, no other barrier was provided. This was identified as an apparent violation of Technical Specification 6.11.1 which requires a barricade for all high radiation areas.

The cause of the violation is programmatic in our interpretation of the requirements of our Technical Specifications and the intent of the regulation with respect to the barrier definition. The arrangement of the access grates and postings leading to the high radiation area was in compliance with the regulation prior to erection of scaffolding for asbestos abatement of the areas in question. However, when it became necessary to keep the ladder hatch open to permit access for the asbestos workers, the posting was repositioned to span the top of the ladder. It was believed, at that time, that this constituted an acceptable barrier to those using the ladder to enter the high radiation area. After discovery by the Inspector and following further discussions, it was determined that this condition was inconsistent with the intent of the regulations and the site Technical Specifications, and therefore, unacceptable.

It should be noted that workers entering this area during the abatement phase of work would have realized the radiation conditions below the ladder entry level since all workers gaining access were briefed via ALARA review of the work conditions.

Corrective Actions Taken:

1. The postings on ladders for the four steam generators were immediately removed and barrier rope and/or swinging gates established with high radiation area postings at the platform access to the steam generator cubicles to prevent inadvertent entry.
2. A plant Radiological Occurrence Report (ROR) was initiated in order to ensure that the condition was promptly evaluated and the results communicated to cognizant individuals.
3. The ROR response included a memo, generated on the day of the observation, communicating the intent of the high radiation area barrier requirement to the Radiation Protection (RP) staff and providing guidance on acceptable barrier configurations.
4. A thorough walk-down of plant high radiation areas was performed by RP supervision to evaluate entry barricades for compliance with the "barrier" definition. While it was found that all barriers were in compliance, minor adjustments were made to further ensure against inadvertent entry.

5. Weekly supervisory surveillance of the on-site high radiation areas for posting and barrier verification has not identified further high radiation area barrier problems, indicating that the communication of this requirement to the RP staff has been effective.
6. Plant procedure AP-8100, "Establishing and Posting Radiological Areas", has been revised to clarify the guidance for posting and barricading of high radiation areas.
7. The Notice of Violation and the Yankee response has been routed to all RP staff for further review of the expectations for establishing controls for a high radiation area.

The above measures are believed to be adequate to prevent recurrence of such an event.

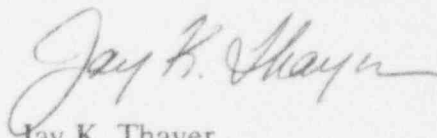
Date of Full Compliance:

Full compliance was achieved on August 27, 1993. Barriers have been configured in compliance with TS requirements and surveillances performed to verify compliance. Personnel have received guidance on acceptable practices for barricading high radiation areas.

If you have any questions or desire additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



Jay K. Thayer
Vice President and Manager of Operations

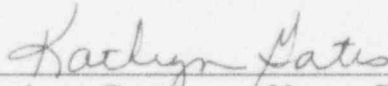
c: Regional Administrator, USNRC, Region 1
NRC Resident Inspector, VYNPS

COMMONWEALTH OF MASSACHUSETTS)

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WORCESTER COUNTY)

Then personally appeared before me, J. K. Thayer, who, being duly sworn, did state that he is a Vice President and Manager of Operations of Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing document in the name and on behalf of Yankee Atomic Electric Company and that the statements therein are true to the best of his knowledge and belief.



Kathryn Gates Notary Public
My Commission Expires January 24, 1997