

Appendix

NOTICE OF VIOLATION

Wisconsin Electric Power Company

Docket No. 50-266

Docket No. 50-301

As a result of the inspection conducted on May 3-4 and June 15, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 20.203(c)(2) requires that entrances to high radiation areas be equipped with a control device which reduces radiation levels, or equipped with a control device which energizes a conspicuous visible or audible alarm that warns the individual entering the area and a supervisor, or be maintained locked with positive control over each individual entry. Technical Specification 15.6.11 requires that keys to locked high radiation areas which are greater than 1000 mrem/hr be maintained under the administrative control of the Duty Shift Supervisor and Plant Health Physicist.

Contrary to the above, an individual inadvertently entered the Unit 1 containment, which contained radiation levels exceeding 1000 mrem/hr, on April 22, 1982. Unit 1 was operating at 77 percent power at the time. The containment door was locked but positive control was not exercised over entry nor was the key maintained under the control of the Shift Supervisor and Plant Health Physicist. Nor was the installed control device conspicuously visible to an individual entering containment.

Contrary to the above, the Unit 2 regenerative heat exchanger area, which contained radiation levels of about 1500 mR/hr during the 1982 refueling outage (April/May), was not maintained locked nor equipped with a control device.

This is a Severity Level III violation (Supplement IV).

2. Technical Specification 15.6.8 states: The plant shall be operated and maintained in accordance with approved procedures. The following instances of failure to meet this requirement were identified during the inspection.

- a. Procedure HP 10.7, "Containment Entry Check in/Check out System," requires that persons entering containment record the entry by utilizing a time card and time recorder system.

Contrary to the above, an auxiliary operator entered the Unit 1 containment on April 22, 1982, without recording his entry as required by Procedure 10.7.

- b. Procedure HP 2.7, "Radiation Work Permits," requires issuance of a radiation work permit for entry into the containment of an operating reactor. Also, entries into areas where radiation levels are greater than 1000 mrem/hr require the use of the "buddy system" or notification of the Duty Shift Supervisor and a high range dosimeter.

Contrary to the above, an auxiliary operator entered the Unit 1 containment, which contained radiation levels exceeding 1000 mrem/hr, without a radiation work permit, without using the "buddy system" or notifying the Duty Shift Supervisor, and without a high range dosimeter.

- c. Procedure HP 8.2, "Radiation Surveys," states: Area surveys shall be completed in potentially hazardous areas prior to personnel entry.

Contrary to the above, area surveys of the Unit 1 containment were not conducted before auxiliary operators' entries on April 22, 1982.

- d. Procedure OP-4D, "Draining the Reactor Coolant System," is applicable only to a shutdown unit and on April 22, 1982, was designated for use on Unit 2.

Contrary to the above, on April 22, 1982, Step 4.25 of Procedure OP-4D was performed on Unit 1 (operating) instead of Unit 2.

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

