



EDISON DRIVE  
AUGUSTA, MAINE 04336  
(207) 623-3521

August 13, 1982  
MN-82-162

United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Mr. Ronald C. Haynes, Director

References: (a) License No. DFR-36 (Docket No. 50-309)  
(b) Letter from USNRC to MYAPCo dated July 14, 1982 -  
Inspection 50-309/82-08

Subject: Response to Inspection No. 50-309/82-08

Dear Sir:

This letter transmits Maine Yankee Atomic Power Company's response to Inspection Report 82-08.

We have herein addressed the specific violations, provided additional information, and described corrective actions completed and planned to reduce the probability of reoccurrence.

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ITEM OF NON-COMPLIANCE - APPENDIX A - PARA. A - PART 1

On May 11, 1982, during a routine inspection of the Primary Auxiliary Building, the entrance to the Degasifier Cubicle, a high Radiation Area was not barricaded and conspicuously posted as such.

RESPONSE:

The area of violation had been barricaded and posted as a high radiation area. Workers who were making repairs to the Waste Disposal Evaporator, removed the caution ribbon and high radiation area sign to facilitate moving a welding machine into the cubicle. Following the movement of this equipment, they failed to replace the barrier and left the area without stationing a guard. The root cause of this violation is attributed to inadequate supervision and practical training.

Following notification of this violation, HP Personnel were immediately instructed to make more frequent checks of High Radiation Areas (HRA), to ensure proper access control and barricading.

ITEM OF NON-COMPLIANCE - APPENDIX A - PARA. A (Con't) - PART 2

On June 3, 1982, the entrance to the resin holdup tank cubicle, an area with whole body dose rates greater than 1000 mrem/hr, was not locked, barricaded and conspicuously posted as a High Radiation Area.

RESPONSE:

Work was being done in the walled-in waste holdup tank area in the Radiation Control Area at the time of this violation. In the course of their work, workers blocked open a normally locked door and left the HRA for additional tools. Closing the door would have meant requesting the Primary Auxiliary Operator to reopen it for them when they returned, a somewhat lengthy delay that they wished to avoid. The root cause of this violation can again be attributed to inadequate supervision and practical training.

Immediate actions were taken following the notification of this violation. All contracted personnel who were involved in this job were given additional HP practical training for a refresher on proper work practices in controlled areas and specific HP requirements. The personnel were also warned that any further HP procedure violations would result in dismissal from the site for those involved.

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ITEM OF NON-COMPLIANCE - APPENDIX A - PARA. B

On June 3, 1982, surveys at the work area covered by Radiation Work Permit 82-06-21 were inadequate because localized High Radiation Areas near the work area and through which the workers passed were not indicated on the general area survey used to allow access to this area.

RESPONSE:

RWP 82-06-21 had been written and the general area survey was taken several days prior to this violation. In the interim, two barrels stored in the area had been removed from the immediate work space to another, more remote part of the area to reduce exposure to the workers. HP Personnel checked the immediate work space and found dose rates similar to those listed on the RWP. However, a new survey of the entire walled-in area was not performed. Later dose rates greater than those stated on the RWP were found. The root cause of this violation can be attributed to insufficiently detailed surveys.

Following notification of this violation, HP Personnel were immediately reappraised of the requirements for extensive work area surveys. The RWP procedure was also revised to stress these requirements. In addition, RWP dose rate surveys must now reflect the entire accessible area and not just the immediate work area.

NOTE:

The foregoing violations reflect inadequacies in our Radiation Work Area Control measures. The following additional steps will be taken to reduce the likelihood of a recurrence:

1. Detailed surveys of all HRAs will be performed to better identify areas not requiring HRA controls. Based on the results of these surveys, measures will be taken to reduce the dose rates so as to decrease the number of locked areas as appropriate.
2. Self-closing gates will be employed as barricades to areas where the dose rates are 100-999 mrem/hr. These will be installed at waist level and will have the proper sign attached.
3. HP Personnel will provide briefings to the working party leader prior to RWP issuance to insure that they understand their responsibilities regarding the radiation area survey and work practices.
4. Continuous HP surveillance is being provided for work being conducted within locked HRAs.

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5. Indoctrination training will put greater stress on Health Physics Training.
6. A notice will be sent to all personnel notifying them that the company will move vigorously to enforce rules and regulations.

With the exception of item 2, these corrective measures should be completed prior to the commencement of the 1982 refueling outage. Item 2 is expected to be completed during the refueling outage contingent upon timely receipt of the self-closing gates.

ITEM OF NON-COMPLIANCE - APPENDIX A - PARA. C

As of May 21, 1982, the Nuclear Safety Audit Review Committee (NSARC) had not reviewed the safety evaluations for Plant Design Change Request 14-81, Plant Alterations 14-80 and 3-81. These changes were completed in 1981 and reported as 10CFR50.59 changes to the NRC in the 1981 Annual Report.

RESPONSE:

The root cause of this violation is that present procedures do not accurately specify design change safety evaluations which need NSARC approval.

7. All design change safety evaluations mentioned in this violation will be sent to NSARC for review by September 1, 1982.
8. Until such time as criteria are developed to identify those which must have NSARC approval, subsequent design change and plant alterations safety evaluations shall be forwarded to NSARC for review.

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ITEM OF NON-COMPLIANCE - APPENDIX A - PARA. D

As of May 26, 1982, 6 of 16 plant positions in response to 1981 audits and 3 of 8 plant positions in response to 1982 audits had not been developed within the required response time.

RESPONSE:

Established measures have not assured the timely completion of plant positions to audit program findings.

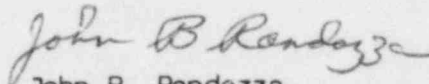
- 9. To avoid further violations, Maine Yankee will review the management controls utilized and make adjustments as necessary to facilitate prompt audit finding responses.

Corrective actions associated with this violation should be completed by October 1, 1982.

We trust this response is satisfactory. Should you have any further question, please feel free to contact us.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY

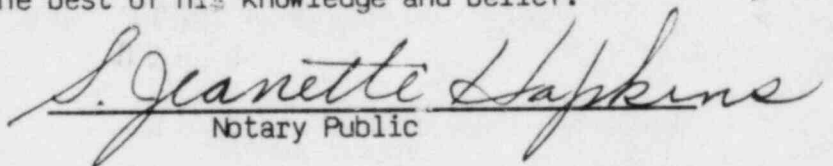


John B. Randazza  
Vice President

JBR:pjp

STATE OF MAINE     )  
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COUNTY OF KENNEBEC)

Then personally appeared before me, John B. Randazza, who, being duly sworn, did state that he is the Vice President of Maine Yankee Atomic Power Company, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Maine Yankee Atomic Power Company, and that the statements therein are true to the best of his knowledge and belief.

  
Notary Public

S. JEANETTE HOPKINS  
NOTARY PUBLIC - STATE OF MAINE  
MY COMMISSION EXPIRES  
MAY 1, 1988