

Appendix

NOTICE OF VIOLATION

Northern States Power Company

Docket No. 50-263

As a result of the inspection conducted on September 27-30, October 12-13, and October 22, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 20.201(b) states: Each licensee shall make or cause to be made such surveys as (1) may be necessary to comply with the regulations in this part and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.
 - a. Contrary to the above, airborne activity surveys were not conducted during operation of the box compactor nor was the filtration system air flow evaluated to determine compliance with 10 CFR 20.103.
 - b. Contrary to the above, radiation surveys in the vicinity of the recirculation system discharge nozzles were not conducted following removal of shielding nor before ultrasonic testing of the nozzle welds began to determine compliance with 10 CFR 20.101.

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

2. Technical Specification 6.5 states, in part, that detailed written radiological control procedures shall be prepared and followed.
 - a. Operations Manual, Volume E, Procedure E.1.5.IV.C "Personnel Contamination Surveys" requires that each individual perform a personal contamination survey when leaving a controlled area.

Contrary to the above, on three separate occasions workers were observed exiting controlled, contaminated areas without performing personal contamination surveys.
 - b. Operations Manual, Volume E, Temporary Memo No. 579 states, in part, that the box compactor shall be filled with waste products to a level not in excess of the container top.

Contrary to the above, the compactor operator was observed filling the container to a level twelve to eighteen inches above the container top. Waste material was forced out of the container and onto the floor when the compactor ram was activated.
 - c. Operations Manual, Volume E, Procedure E.1.3.IV.A states, in part, that a specific Radiation Work Permit (RWP) is issued for a particular job or activity.

Contrary to the above, a specific RWP was not issued for the box compacting activity. A general entry RWP authorizing only inspection type activities was used.

- d. Operations Manual, Volume E, Procedure E.1.1.I.A requires that individuals abide by the instructions on radiation work permits (RWPs) when entering a posted area.

Contrary to the above, a survey of the work area surrounding recirculation discharge nozzle "H" was not conducted before the start of ultrasonic testing of the nozzle as required by RWP No. 638.

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

3. 10 CFR 20.202(a)(1) states that each licensee shall supply appropriate personnel monitoring equipment to each individual who enters a restricted area under such circumstances that he receives, or is likely to receive, a dose of 25 percent of the limit specified in paragraph (a) of 20.101. The extremity limit is 18.75 rems per calendar quarter.

Contrary to the above, on October 1, 1982, a worker who had not been supplied extremity monitoring equipment received a calculated dose to his hands of 7.4 rems which is approximately 40 percent of the quarterly limit.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

NOV 24 1982

Dated

Original signed by C. E. Norelius
C. E. Norelius, Director
Division of Engineering and
Technical Programs