

APPENDIX A

NOTICE OF VIOLATION

Sacramento Municipal Utility District
P.O. Box 15830
Sacramento, California 95813

Docket No. 50-312
License No. DPR-54

As a result of the inspection conducted January 10-14 and 18-21, 1983, and in accordance with the NRC Enforcement Policy 10 CFR Part 2, Appendix C, the following violations were identified.

- A. Technical Specification Section 6.8, Procedures, in 6.8.1 states in part that, "Written procedures shall be---~~implemented~~---covering activities referenced below: a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972". Regulatory Guide 1.33 in Section 6. Procedures for Control of Radioactivity, identifies item 5.c Surveys and Monitoring.

The licensee's Administrative Procedure AP-305 Radiation Control Manual in Section 3.4.1 Contamination Limits states in part, "The primary means of quantifying smearable (or loose) contamination will be the counting of standard smear papers in one of the laboratory proportional counters.---Any detectable activity measured by means of a G.M. or exposure rate instrument shall be quantified by laboratory analysis." In addition Administrative Procedure AP-305-9, Revision 1, Removal of Tools and Equipment from Controlled Areas, states in part in Section 3.1, "All items removed from controlled areas of the plant must be surveyed for radiation and removable contamination prior to release to uncontrolled areas."

Contrary to the above, on January 11, 1983, a 55 gallon drum clearly marked with the radiation caution symbol and the words "Caution Radioactive Material - contaminated lead shot - Co⁵⁸, Co⁶⁰, Mn⁵⁴ ---", was released from the Auxiliary Building, a controlled area, for use in an uncontrolled area, without survey of the drum interior and contents including smear tests. Subsequent surveys of the drum interior and contents did not include smear tests to evaluate the level of removable contamination.

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

- B. Technical Specification 4.10, Emergency Control Room Filtering System requires in part that: "4.10.1 The Control Room Emergency Ventilation System shall be:
- A. Demonstrated operable at least once per 31 days by initiating flow through the HEPA filters and charcoal adsorbers."

Contrary to the above, the Emergency Control Room Filtering System was not demonstrated operable once every 31 days in that from September 13, 1982 (when the amended Technical Specification became effective) through January 18, 1983 the system had been tested only on November 9, 1982. Prior system testing had been performed on August 19, 1982.

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Sacramento Municipal Utility District is hereby required to submit to this office within thirty days of the date of this notice, a written statement or explanation in reply including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance, and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

MAR 03 1983

ORIGINAL SIGNED BY
H. S. NORTON

Dated _____

F. A. Wenslawski, Chief, Reactor
Radiation Protection Section