

Appendix A

Notice of Violation

GPU Nuclear Corporation
Oyster Creek Nuclear Generating Station

Docket No. 50-219
License No. DPR-16

As a result of the inspection conducted on September 27 - 30 and October 5 - 8, 1982, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987), the following violations were identified:

- A. 10 CFR 20.201(b) requires that each licensee shall make or cause to be made such surveys as may be necessary to comply with the regulations in this part. 10 CFR 20.201(a) defines "survey" as an evaluation which includes the measurements of concentrations of radioactive materials.

Contrary to the above, for the period March 25, 1982, through September 30, 1982, inadequate gamma spectroscopy measurements of effluent samples were made in that the measurements were made using improper efficiency values for your gamma spectroscopy system.

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

- B. Section 6.8.1 of the Technical Specifications requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33-1972. ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33-1972 require procedures for control of measuring and test equipment, including laboratory equipment; and chemical and radiochemical control procedures including validity of calibration techniques and adequacy of analyses.

1. Procedure 807.6, "QA Analyses by Contractor Laboratories", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that ten percent of the samples sent to the contractor laboratory be split, spiked or standard samples.

Contrary to the above, Procedure 807.6 was not implemented in that split, spiked or standard samples were not sent to the contractor laboratory as required for the period October, 1981 to October, 1982.

2. Procedure 807.7, "Laboratory QA and QC - Standard, Spiked, and Blind Samples", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that standard, spiked and blind samples be prepared at a frequency determined by the Chemical Supervisor.

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Contrary to the above, Procedure 807.7 was not implemented in that standard, spiked and blind samples were not prepared for the period October, 1981 to October, 1982.

3. Procedure 807.9, "Laboratory QA and QC - Control of Analytical Performance", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that precision and accuracy determinations be performed on at least ten percent of the samples.

Contrary to the above, Procedure 807.9 was not implemented in that precision and accuracy determinations were not performed as required for the period October, 1981 to October, 1982.

4. Procedure 807.1, "Laboratory QA and QC - General Scope", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that all duplicate sample results be reviewed by supervisory personnel.

Contrary to the above, Procedure 807.1 was not implemented in that 21 percent of the duplicate sample results were not reviewed by supervisory personnel as required.

5. Procedure 908.2, "Calibration of the Beckman LS100 Liquid Scintillation Counter", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that the liquid scintillation counter be calibrated on an annual basis.

Contrary to the above, Procedure 809.2 was not implemented in that the liquid scintillation counter was not calibrated as required for the period January, 1981 to October, 1982.

6. Procedure 809.3, "Calibration of the Beckman Widebeta Counting System", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that full scale plateaus and efficiency checks be performed following repairs.

Contrary to the above, Procedure 809.3 was not implemented in that full scale plateau and efficiency checks were not performed following repairs made during the period October, 1981 to October, 1982.

7. Procedure 809.5, "Calibration of TN 11 Multi-channel Analyzer", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that corrective action be taken when the ratio of the observed activity to the actual activity in the daily standard exceeds 1.10.

Contrary to the above, Procedure 809.5 was not implemented in that for the period March 25, 1982 to September 30, 1982, corrective action was not taken as required when the ratio of the observed activity to the actual activity in the daily standard exceeded 1.10.

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

- C. Section 6.8.1 of the Technical Specifications requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements of ANSI N 18.7-1972 and Appendix A of Regulatory Guide 1.33-1972. Section 6.8.2 of the Technical Specifications requires that the procedures of Section 6.8.1 shall be reviewed by the Plant Operations Review Committee and approved by the Director, Station Operations prior to implementation. ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33-1972 include procedures used for effluent sample analyses.

Contrary to the above, the procedures used by a vendor laboratory for performing strontium and tritium analyses of effluent samples, and the procedures used by a contractor on site for calibrating the Ge(Li) detector, which is used for analyzing effluent samples, were not reviewed and approved as required for the period October 1, 1981 to October 1, 1982.

This is a Severity Level V violation (Supplement I).

- D. Section 6.8.1 of the Technical Specifications requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements of ANSI N 18.7-1972 and Appendix A of Regulatory Guide 1.33-1972. ANSI N18.7 and Appendix A of Regulatory Guide 1.33-1972 require procedures for control of radioactivity. Section 6.8.2 of the Technical Specifications requires that the procedures of Section 6.8.1 shall be reviewed by the Plant Operations Review Committee and approved by the Director, Station Operations prior to implementation.

Contrary to the above, the procedures used for operation and calibration of the health physics gamma spectrometer until October 8, 1982 were not reviewed and approved prior to implementation as required.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit to this office within 30 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 violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.