PACIFIC GAS AND ELECTRIC COMPANY

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

January 9, 1984

PGandE Letter No: DCL-84-008

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
IE Inspection Report 83-38/83-26--Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 83-38/83-26, dated December 9, 1983, included a Notice of Violation (Severity Level IV). PGandE's response to this Notice is enclosed.

PGandE concurs with the NRC's opinion that this incident is of a relatively minor radiological significance. PGandE is also concerned that situations of this nature not set a precedent for procedural noncompliance, since compliance with approved procedures, including radiological procedures, is the policy of the Nuclear Power Generation Department. Please be assured that the radiation protection program at Diablo Canyon has always received and will continue to receive strong management support.

Sincerely,

J O Schuyler

Enclosure

cc: Service List

84-008

ENCLOSURE

PGandE Letter No.: DCL-84-008

RESPONSE TO NOTICE OF VIOLATION

NRC INSPECTION REPORT 50-275/83-38 and 50-323/83-26

On December 9, 1983, NRC Region V issued a Severity Level IV Notice of Violation ("Notice"), as part of NRC Inspection Report 50-275/83-38 and 50-323/83-26 on Diablo Canyon Units 1 and 2. The Notice cited a concern that individuals working in the control area in containment did not evacuate upon the sounding of the evacuation alarm, and three individuals did not log out and/or record their pencil dosimeter readings.

STATEMENT OF VIOLATION

Technical Specification, Section 6.8, Procedures and Programs, states in part that, "Written procedures shall be established, implemented and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 7, Procedures for Control of Radioactivity, recommends radiation protection procedures in access control to radiation areas including a radiation work permit system.

1) Radiation Control Procedure G-1, Revision 3, November 29, 1982, "Work in Control Areas" requires in part that "Personnel will cease working and leave the control area...upon the sounding of the evacuation alarm."

   Contrary to the above, on November 17, 1983, individuals working in the control area in containment under Special Work Permit 83-179 did not evacuate upon the sounding of the evacuation alarm.

2) Radiation Control Procedure G-1 also requires that "Each person shall log time in and time out of the Controlled Area... The reading on the pencil dosimeter shall be recorded on the form for each entry and exit."

Contrary to the above, on November 17, 1983, three individuals did not log out and/or record their pencil dosimeter readings on Special Work Permits numbers 83-175 and 83-179.

CORRECTIVE STEPS TAKEN AND AN EXPLANATION

1. At the time of the referenced containment evacuation alarm, the shift foreman and control operator were on the manipulator crane. The manipulator was positioned over the Reactor Vessel with a fuel assembly fully withdrawn into the mast. An auxiliary operator and a Westinghouse engineer were in the refueling cavity at the reactor vessel flange, an auxiliary control operator was near the access point to the controlled area, and a senior control operator was at the fuel transfer mechanism control panel near the NE corner of the refueling cavity.

   Other personnel located inside containment, but outside the controlled area, included a Chemistry and Radiation Protection Technician at the access control point, approximately 8 to 10 visitors near the SW corner of the refueling canal, and three NPO and startup engineers at the NW corner of the refueling canal (monitoring the dunking chambers).

   When the alarm occurred, the shift foreman instructed the control operator to remain on the manipulator crane while the shift foreman contacted the Control Room. Operating Procedure B-8D Supplement 1, Precaution 4 requires that "In the event of a required halt to reactivity additions, fuel assemblies will not be left suspended but moved to a suitable and safe excore location...". The shift foreman then left the refueling bridge from the south end and proceeded to the telephone at the fuel transfer control station, while the control operator proceeded to place the fuel assembly in a "suitable and safe" location as required. The

intercom on the refueling bridge could not be used due to the containment evacuation alarm in progress. The alarm was not reset for approximately 15 to 20 seconds.

When the shift foreman reached the area of the access control point, the auxiliary control operator and senior control operator were already in this area (the alarm was not ignored) and the shift foreman directed them to the personnel hatch (outside the controlled area). At approximately this time, the alarm was reset and the control operator motioned for the shift foreman to return to the refueling bridge because the Control Room had notified him that the alarm was spurious.

At this point, the need to assemble at the personnel hatch no longer existed; therefore, no further effort was made to have personnel respond to the alarm.

Although all personnel inside the controlled area did not immediately leave, the alarm was not ignored. Work was stopped and the cause of the alarm was determined prior to resuming fuel loading. The alarm was reset within 20 seconds and personnel were notified immediately afterwards that it was spurious. The shift foreman made no effort to inform the inspector that the alarm was spurious prior to returning to work, as he was not aware at the time that the inspector was inside of the containment.

Subsequent to this alarm incident, fuel handling personnel were reminded to follow the provisions of Operating Procedure B-8D Supplement 1, Precautions and Limitations Step 7 which states:

> If an evacuation alarm occurs, CORE ALTERATIONS shall be suspended immediately and personnel on the manipulator crane shall assemble near the inner main airlock door. The shift nuclear engineer and shift foreman (SRO) shall determine the cause of the alarm. The SRO shall determine the response to be taken.

Additionally, a memo dated, December 5, 1983, from the Plant Superintendent, emphasizing the importance of adhering to all radiological control procedures, was distributed to all plant personnel.

PGandE believes that full compliance with radiological control procedures concerning personnel leaving a controlled area upon the sounding of the evacuation alarm was in effect, with the above efforts, by December 5, 1983.

2. During the period November 15 through November 23, 1983, there were 1126 entries and exits made at the radiological controlled areas established for loading Unit 1 fuel under provisions of special work permits 83-175 and 83-179. From this total of 1126, three individuals failed to sign out of the controlled area when exiting. One of the individuals, upon realizing that he had not signed out, returned to the control point in containment to log out.

   The purpose of an individual signing out and entering their estimated exposure on the SWP is to provide a convenient mechanism of keeping track of exposure status. Failure of an individual to sign out in itself does not prevent tracking of exposure status. Other methods include consulting with the individual, or if necessary, processing of the thermal luminescent dosimeter.

   In order to reduce instances of this nature, when the main radiological controlled area is established for the Unit 1 auxiliary building and containment prior to criticality, an individual will be posted continuously at access control to monitor logging in and out of the controlled area. Once the plant staff becomes experienced in meeting all of the administrative requirements for entering and exiting radiological controlled area and it is determined that this monitoring is no longer required, the monitor may be assigned to other duties.

Additionally, a memo, dated December 5, 1983, from the Plant Superintendent, emphasizing the importance of adhering to all radiological control procedures, was distributed to all plant personnel.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

PGandE believes that full compliance with radiological control procedures concerning 1) personnel leaving a controlled area upon the sounding of the evacuation alarm, and 2) controlled area access was in effect by December 5, 1983 because of the actions described above.