

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

January 3, 1996

WM 95-0175

U. S. Nuclear Regulatory Commission
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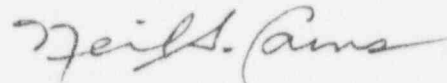
Reference: Letter dated December 4, 1995, from J. E. Dyer,
NRC, to N. S. Carns, WCNOG
Subject: Docket No. 50-482: Response to Violation
482/9524-01

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOG) reply to Notice of Violation 9524-01 which was documented in the referenced report by the Resident Inspectors. Violation 9524-01 concerned a lack of thorough radiation work permit planning for work tasks performed by the health physics technicians.

WCNOG's response to this violation is in the attachment to this letter. If you should have any questions regarding this response, please contact me at (316)364-8831, extension 4000, or Mr. W. M. Lindsay at extension 8760.

Very truly yours,



Neil S. Carns

NSC/jad

Attachment

cc: L. J. Callan (NRC), w/a
W. D. Johnson (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

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Reply to Notice of Violation 482/9524-01

Violation 482/9524-01: Lack of thorough radiation work permit planning for work tasks performed by health physics technicians.

During an NRC inspection conducted on October 8, 1995 through November 18, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34581; June 30, 1995), the violation is listed below:

"Technical Specification 6.11 states, in part, that procedures for personal radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20, and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

- (1) Procedure RPP 02-105, 'RWP [Radiation Work Permit],' Revision 7, Step 9.2.5, requires the radiation work permit preparer to specify the radiological conditions for the immediate work area on the radiation work permit.

Contrary to the above, on November 13, 1995, a health physics technician sampled resin using Radiation Work Permit 950019, Revision 23, without radiological conditions for the immediate work area near the sample valve being specified on the radiation work permit.

- (2) Procedure RPP 02-105, 'RWP [Radiation Work Permit],' Revision 7, Step 9.5.6, requires that health physics coverage requirements be specified on the radiation work permit for a system breach of contaminated systems.

Contrary to the above, on November 13, 1995, a health physics technician breached the contaminated resin transfer system to obtain a resin sample without health physics coverage requirements for the system breach and sampling operation being specified on the radiation work permit."

Admission of Violation:

WCNOC acknowledges and agrees that a violation of Wolf Creek Generating Station (WCGS) Technical Specification (TS) 6.11 occurred when health physics personnel failed to adequately prepare a radiation work permit which would specify the radiological work conditions for the resin transfer work activity, including sampling. WCNOC further acknowledges that a health physics technician obtained a sample from a contaminated system without specific health physics coverage requirements of the sampling operation on the radiation work permit.

WCNOC has a concern on item (2) of the Notice of Violation which states that the RWP should have addressed the resin sample activity as a system breach. At WCNOC, sampling is not considered a system breach. WCNOC recognizes that a weak definition for system breach was used in procedure RPP 02-105, "RWP,"

Revision 7. WCNOC has revised RPP 02-105 to clarify the definition of system breach as ". . . the physical opening of a contaminated system for maintenance or modification. Sampling of contaminated systems is not considered a system breach." Personnel who routinely sample contaminated systems are trained in the specific aspects of sampling to prevent the spread of contamination.

Reason for Violation:

On November 13, 1995, a routine sample was obtained by a health physics technician as part of a work activity to transfer resin from the primary resin tank to a high integrity container in the radwaste building. During this particular sampling event, a minor resin spill occurred. No personnel contamination occurred. The technician had performed many resin sampling evolutions prior to this occasion. Though no problems with resin sampling had occurred in the past during sampling evolutions, the technician had prestaged controls (i.e., rubber gloves and a catch pan) which are routine precautions when sampling a contaminated system.

The special instructions on RWP 950019, Revision 23, stated that rubber gloves were required to reach into contaminated areas. Rubber gloves with surgeon's gloves over them were worn by the technician. The guidance in RPP 03-505, "Selection of Protective Clothing," Revision 2, Attachment A, states that rubber gloves are appropriate protective clothing for a reach across activity.

WCNOC recognizes that RWP 950019, Revision 23, contained weak instructions which did not provide an adequate description of resin transfer activities. Activities associated with resin transfer should have been specified on RWP 950019, Revision 23. The RWP only covered the set-up of resin transfer activities prior to resin transfer, and not the resin transfer evolution.

The root cause for these weak RWP instructions was personnel error in the preparation of RWP 950019, Revision 23, by Health Physics personnel.

Corrective Steps That Have Been Taken and the Results Achieved:

The Control Room and Health Physics were notified. The resin transfer was stopped, and the precautionary measures put in place effectively isolated the spill and controlled the spread of contamination. The contaminated resin was removed and the area was properly cleaned.

RWP 950019 was revised (Revision 24) to include the transfer evolution in the work activities, including sampling and access to radiological areas. This revision to the RWP addresses the specific concerns of health physics coverage requirements, and minimum protective requirements for work being performed on this RWP. The special instructions were also revised to specify that rubber gloves are a requirement to reach into contaminated areas, such as during resin sampling.

Personnel responsible for preparing RWPs have been verbally counseled by the Superintendent Radiation Protection on the need for providing complete and thorough RWPs.

This event has been entered into the training IMPACT system to be evaluated for inclusion in health physics technician future training cycles.

Health physics personnel reviewed the 1995 and 1996 RWPs for generic implications on insufficient activity description. No further inadequacies relative to this event were found.

RPP 02-105, "RWP," has been revised to provide a clear definition of system breach.

Corrective Steps That Will Be Taken and the Date When Full Compliance Will Be Achieved:

The corrective steps described above are considered appropriate and sufficient to avoid further violations of this nature.