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May 20, 1997

Docket No. 50-424
50-425

LCV-1023-A

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REPLY TO A NOTICE OF VIOLATION**

Pursuant to 10 CFR 2.201, Southern Nuclear Operating Company (SNC) submits the enclosed information for Vogtle Electric Generating Plant (VEGP) in response to enforcement action EA 97-129, for the violation identified in Nuclear Regulatory Commission (NRC) Inspection Report Nos. 50-424; 425/97-02, and identified during an inspection conducted from February 10-14 and March 3-7, 1997. In the enclosure, a transcription of the violation precedes SNC's response.

Should you have any questions feel free to contact this office.

Sincerely,


C. K. McCoy

CKM/CTT/afs

Enclosure: Reply to NOV 50-424;425/ 97-02 (EA 97-129)

cc: Southern Nuclear Operating Company

Mr. J. B. Beasley, Jr.

Mr. M. Sheibani

NORMS

U. S. Nuclear Regulatory Commission

Mr. L. A. Reyes, Regional Administrator

Mr. L. L. Wheeler, Licensing Project Manager, NRR

Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

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ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO A NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/97-02

VIOLATION 50-424; 425/97-02 (EA 97-129)

The following is a transcription of the violation as cited in the Notice of Violation (NOV):

"During an NRC inspection conducted on February 10-14, and March 3-7, 1997, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions,' NUREG-1600, the violation is listed below:

10 CFR 71.5 (a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 170 through 189.

49 CFR 173.475 requires, in part, that before each shipment of any Class 7 (radioactive) materials package, the offeror must insure by examination or appropriate tests, that the external radiation and contamination levels are within the allowable limits in 49 CFR Parts 171-178. 49 CFR 173.441 (b) requires in part, that each package of radioactive material offered for transportation by exclusive-use, closed transport vehicle, be designed and prepared for shipment so that under conditions normally incident to transportation the radiation level does not exceed 10 millisievert per hour (1000 millirem per hour) at any point on the external surface of the package.

Contrary to the above, on October 23, 1996, the licensee offered for transportation by exclusive-use, closed transport vehicle, a package which arrived at its destination having maximum surface radiation levels exceeding 10 mSv/hr (1000 mrem/hr). Specifically, on October 29, 1996, radiation surveys of the unopened packages at the final destination measured a maximum external surface dose rate of approximately 20 mSv/hr (2000 mrem/hr).

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

RESPONSE TO VIOLATION 50-424; 425/97-02 (EA 97-129)

Admission or Denial of the Violation:

This violation occurred as stated in the notice of violation.

Reason for the Violation:

On October 16, 1996, an exclusive-use, closed transport vehicle radioactive materials package, which included refueling outage equipment, was prepared for offsite shipment.

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 & 2 REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORTS 50-424; 425/97-02

At the time the package was prepared, the normal practice for preparing equipment which had been stored in the Spent Fuel Pool, was to flush, allow to drip-dry, and wipe down external surfaces. Typically, inaccessible internal surfaces are not wiped down or allowed to dry prior to packaging and shipping.

On October 23, 1996, the package was surveyed and shipped offsite. Dose rates on the package containing the guide tube were acceptable when the package was prepared and shipped. At some point during the time interval between the transport trailer leaving VEGP on October 23, 1996, and unloading at the vendor facility on October 29, 1996, conditions inside the guide tube changed. Dose rates which exceeded the DOT limits on the external surface of the package were discovered when the box was unloaded. Dose rates on the outside of the transport trailer remained within regulatory limits at all times during transport.

A detailed investigation identified a microscopic discrete particle contained within the guide tube. The probable cause of the changes in radiological conditions inside the guide tube could be attributed to the guide tube not being completely dry prior to packaging. As the tube dried out, the particle changed geometry during transport or handling at the vendor facility which created the higher dose rates.

Corrective Steps Which Have Been Taken and the Results Achieved:

1. A policy was established for health physics and decontamination personnel requiring that items being removed from the Spent Fuel Pool be allowed to dry prior to being surveyed, wrapped and packaged for shipment.
2. Training was conducted for health physics personnel regarding surface contaminated object shipments stressing the need to ensure that "Hot Spots" are identified and shielding applied as necessary.

Corrective Steps Which Will Be Taken to Avoid Further Violations:

Prior to the 1R7 refueling outage, which is scheduled to begin in September 1997, the refueling services vendor will develop material and tool cleanliness procedures to properly dry packages prior to shipment for any equipment shipped from VEGP.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 29, 1996, when the package was identified to be over the DOT limits at the vendor facility.