

September 21, 1998

EA 98-303

Mr. Walter G. MacFarland IV  
Senior Vice President  
Clinton Power Station  
Illinois Power Company  
Mail Code V-275  
P. O. Box 678  
Clinton, IL 61727

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 50-461/98015)

Dear Mr. MacFarland:

This will acknowledge receipt of your letter dated September 10, 1998, in response to our letter dated August 11, 1998, transmitting a Notice of Violation associated with the failure of an individual to adhere to radiation protection requirements at the Clinton Power Station. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

Sincerely,

Original /s/ J. A. Grobe

John A. Grobe, Director  
Division of Reactor Safety

Docket No.: 50-461  
License No.: NPF-62

Enclosure: Ltr dtd 9/10/98 from W. MacFarland,  
Illinois Power to USNRC

See Attached Distribution

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Walter G. MacFarland IV  
Senior Vice President  
and Chief Nuclear Officer

U-603075  
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September 10, 1998

Docket No. 50-461

Document Control Desk  
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Washington, D.C. 20555

Subject: Reply to Notice of Violation Contained in  
Inspection Report 50-461/98015 (DRS)

Dear Madam or Sir:

The purpose of this letter is to provide the Illinois Power (IP) response to the Notice of Violation (NOV) documented in NRC Inspection Report 50-461/98015 (DRS). IP admits that this violation occurred. In addition, aggressive action has and will continue to be taken to address issues associated with radiation worker adherence to radiation protection procedures.

The NOV identifies the failure of an individual to use a half man frisker (personal contamination monitor) when exiting the Radiological Controls Area as required by station procedures. Additionally, a concern regarding continuing problems associated with radiation protection procedural adherence was identified. Illinois Power has taken substantial actions to improve management oversight and accountability at CPS over the past several months. The response to this NOV and concerns regarding radiation protection procedural adherence is contained in Attachment A of this letter.

IP believes that the actions described in the attached response address the concerns identified in this Notice of Violation.

Sincerely yours,

Walter G. MacFarland, IV  
Senior Vice President and  
Chief Nuclear Officer

JRF/krk

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Attachments

cc: NRC Clinton Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

## **Response to Notice of Violation 50-461/98015-01**

The violation states in part:

“Technical Specification 5.4.1 requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, February 1978, Section 7(e) recommends that radiation protection procedures be implemented which cover personnel monitoring and contamination control.

Procedure CPS No. 1024.02, Revision 2, “Radiological Work Control,” implements Technical Specification 5.4.1 by addressing personnel monitoring and contamination control. Section 2.1 of that procedure requires, in part, that prior to exiting the Radiological Control Area (RCA) utilizing any point other than the designated areas, an individual must obtain approval from a Radiological Operations Supervisor. Further, all personnel exiting the RCA must successfully pass through a “half man frisker” (a personal contamination monitor), or when authorized by radiological operations, monitor themselves by performing a manual whole body “frisk” (survey), or contact radiological operations personnel for assistance.

Contrary to the above, on January 19, 1998, an individual exited the RCA utilizing a point other than the designated areas without obtaining approval from a Radiological Operations Supervisor. Furthermore, the individual failed to pass through a personal contamination monitor, failed to perform a whole body survey and did not contact radiological operations personnel for assistance.”

### Background and Reason for the Violation

On January 19, 1998, at approximately 1700 hours, Clinton Power Station (CPS) conducted a planned fire drill as ongoing training to ensure the operational readiness of the CPS fire brigade. The operations crew scheduled to participate in this drill had failed a previous drill conducted in December 1997, due to an untimely response. Prior to the fire drill, a pre-job brief was conducted on the standard rules for fire drills that included the requirement to follow all security and radiological protection requirements. When the fire drill started, members of the Fire Brigade responded to a fire brigade equipment storage cage, located inside the RCA, to don protective equipment including self contained breathing apparatuses (SCBAs). During the process of donning protective equipment, the Fire Brigade Leader (FBL) discovered that all of the SCBAs had been taken. The shortage of SCBAs at this fire brigade equipment storage cage was attributed to extra Fire Brigade members who were participating in the drill in order to maintain their fire brigade qualification. The FBL decided to obtain a SCBA from another fire brigade equipment storage cage located outside the RCA. Upon approaching the RCA boundary, the FBL asked a Radiation Protection Technician (RPT) standing in the area if they were a RPT

and then quickly exited the RCA without utilizing a half man frisker or receiving a response from the RPT. The FBL then obtained a SCBA from the fire brigade equipment storage cage located outside the RCA and returned to the drill location inside the RCA.

The RPT who witnessed the FBL exit the RCA without processing through a half man frisker as required notified the Radiation Protection Shift Supervisor (RPSS) of this act. The RPSS directed the RPT to perform radiological surveys in the area outside the RCA that had been compromised by the FBL. The results of the survey detected no contamination above background. Upon completion of the fire drill, the RPSS restricted the FBL's access to the RCA and wrote Condition Report 1-98-01-242 to investigate and track this issue to resolution.

The reason for this violation was the FBL made a conscious decision to exit the RCA without properly processing through a half man frisker. A self imposed time limit, associated with the drill, was the motivating influence in the decision to violate the established procedural requirements.

#### Corrective Steps Taken and Results Achieved

A radiological survey of the area outside the RCA compromised by the FBL exiting the RCA without processing through a half man frisker was performed. No activity above background was detected.

The FBL was counseled by the Assistant Plant Manager of Operations and the Assistant Director of Operations and appropriate disciplinary action was taken. Expectations concerning procedural compliance associated with radiation worker practices and the resulting consequences of this event were also addressed with the FBL.

#### Corrective Steps to Avoid Further Violations

In addition to the corrective actions stated, Illinois Power (IP) has taken other substantial actions to improve management oversight and accountability at CPS. These actions include adding a number of new members to the management team at CPS. In previous assignments, these individuals have shown a clear understanding of the importance of continuous improvement and striving for excellence.

Management Action Response Checklist (MARC) training has also been provided to managers, directors, supervisors, and group leaders to establish coaching and counseling practices to be used with their personnel. In addition, a Leadership Development Institute (LDI) course has been developed and is in progress. This is a three-week course for first line supervisors and a one-week course for middle and senior managers. This course includes a model for accountability that is used by CPS personnel to measure themselves against during the performance of assigned work.

A program of in-plant observation by management has also been implemented. This program includes a means of measuring behaviors and reinforcing the expectations of management regarding the standards of performance for work that minimizes human error. The purpose of this monitoring program is to improve performance by ensuring management awareness of the work force values, practices, and behaviors. This program also provides for feedback to the work force regarding management expectations.

Personnel accountability for violating radiation worker performance has also been increased. Disciplinary guidelines have been put in place for violating access control requirements for signing in and out on Radiation Work Permits. Performance indicators for Radiation Worker events indicate an improving trend since the implementation of these corrective actions.

Date When Full Compliance Will Be Achieved

Clinton Power Station is currently in full compliance with NRC-required radiation protection procedures.