

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

May 13, 1988

WM 88-0128

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

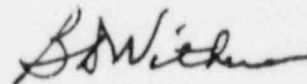
Reference: Letter dated April 15, 1988 from L. J. Callan, NRC, to
B. D. Withers, WCNOG
Subject: Docket No. 50-482: Response to Violation 482/8809-01

Gentlemen:

Attached is a detailed response to Violation 482/8809-01 which was documented in the Reference. Violation 482/8809-01 involved the failure to lock a high radiation area.

If you have any questions concerning this matter, please contact me or Mr. O. L. Maynard of my staff.

Very truly yours,



Bart D. Withers
President and
Chief Executive Officer

BDW/jad

Attachment

cc: B. L. Bartlett (NRC), w/a
R. D. Martin (NRC), w/a
P. W. O'Connor (NRC), w/a (2)

TE06
11

Violation (482/8809-01): Failure to Lock a High Radiation Area

Finding:

Technical Specification 6.12.2 requires that areas assessible to personnel with radiation levels greater than 1000 mrem/hr at 18 inches from the radiation source shall be provided with locked doors to prevent unauthorized entry.

Contrary to the above, on March 17, 1988, an NRC inspector determined that a high radiation area greater than 1000 mrem/hr (1300 mrem/hr) at 18 inches from the radiation source on the portable demineralizer located in the low level drum storage area of the radwaste building was not provided with a locked door to prevent unauthorized entry into the area.

Reason for Violation:

Technical Specification 6.12.2 states, "For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, the individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device".

Wolf Creek Nuclear Operating Corporation (WCNOC) considered the low level drum storage area which contained the portable demineralizer to be a large area in accordance with Technical Specification 6.12.2. The low level drum storage area of the radwaste building, containing the portable demineralizer, was barricaded with yellow and magenta barrier tape, conspicuously posted, and an activated flashing light was present as a warning device per the large area criteria of Technical Specification 6.12.2. During the inspection in which this situation was identified, the NRC informed WCNOC that they did not consider this area to be a large area and a violation would be issued for not providing a locked door to prevent unauthorized entry into the area.

Corrective Steps Which Have Been Taken and Results Achieved:

As a result of the NRC identified concern, a locked high radiation area boundary was established at the door controlling entry into the south end of the radwaste building, expanding the controlled area.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

The door to the south end of the radwaste building has been maintained locked when the radiation levels are greater than 1000 mrem/hr at 18 inches from the radiation source.

Additionally, a work request had been written two weeks prior to the NRC Inspector's arrival to pursue having an enclosure built around the portable demineralizer skid. This work request has been submitted to Nuclear Plant Engineering for evaluation and subsequent issuance of a Plant Modification Request, if deemed appropriate.

Date When Full Compliance Will Be Achieved:

Full compliance has been achieved.