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the southern electric system

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September 21, 1988

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

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REPLY TO A NOTICE OF VIOLATION

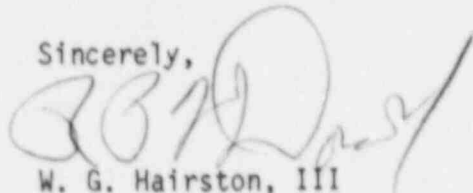
Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Georgia Power Company (GPC) submits the enclosed information in response to NRC Inspection Report 50-424/88-31 which concerns the inspection conducted by Mr. R. E. Weddington of the NRC Region II staff on July 12-14, 1988. A copy of this response is being provided to the NRC Region II office for review.

In the enclosure, transcription of the NRC violation precedes the GPC response.

Should there be any questions in this regard, please contact this office at any time.

Sincerely,



W. G. Hairston, III

WTN/11h

Enclosure:

1. Violations 88-028-02 and 88-028-03 with GPC Response

c: (see next page)

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c: Georgia Power Company
Mr. P. D. Rice
Mr. G. Bockhold, Jr.
Mr. J. E. Swartzwelder
Mr. J. P. Kane
Mr. W. T. Nicklin
Vogtle-NORMS
GO-NORMS

U. S. Nuclear Regulatory Commission
Dr. J. N. Grace, Regional Administrator
Mr. J. B. Hopkins, Licensing Project Manager, NRR (2 copies)
Mr. J. F. Rogge, Senior Resident Inspector - Operations, Vogtle

ENCLOSURE 1

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
NRC NOTICE OF VIOLATION 88-28-02 AND GPC RESPONSE

VIOLATION 50-424/88-28-02

"10 CFR 20.203(f)(1) requires each container of licensed material to bear a durable, clearly visible label identifying the radioactive contents. 10 CFR 20.203(f)(2) requires that the label bear the radiation caution symbol and the words 'CAUTION, RADIOACTIVE MATERIAL' or 'DANGER, RADIOACTIVE MATERIAL' and also provide sufficient information to permit individuals handling or using the container, or working in the vicinity thereof to take precautions to avoid or minimize exposure. Contrary to the above, the licensee failed to label as radioactive material a control room radiation monitor containing a 1.1 microcurie Strontium 90 source which was subsequently shipped to the Westinghouse Facility in Hunt Valley, Maryland on February 10, 1988, without complying with Department of Transportation regulations.

The exceptions to labeling contained in 10 CFR 20.203(f)(3) were not applicable in this case.

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

RESPONSE TO VIOLATION 50-424/88-28-02

Admission or denial of the alleged violation:

The violation occurred as stated.

Reason for violation:

The violation occurred because of the uncontrolled removal of the radiation labeling, (i.e., cover plate to which labels were affixed) thus allowing the shipment of the radiation monitor containing the strontium 90 source without proper identification and labeling. The root cause of this violation was inadequate administrative control of check sources.

Corrective steps which have been taken and the results achieved:

Prompt corrective steps which were taken to address this incident are summarized as follows:

1. An Event Review Team was established to investigate this event.
2. An inventory of radioactive sources under Health Physics (HP) control was made and no further discrepancies were found.

The long term corrective action which have been taken include:

1. Materials personnel were trained on the following:
 - a. Radioactive sources may be used or handled only by or under the direction of HP personnel in accordance with Procedure 43007-C, "Issuance, Use, and Control of Radiation Work Permits".
 - b. Covers marked with radiation symbols and/or labels should not be removed from equipment except by or under the direction of HP personnel.

ENCLOSURE 1 (Con't)

NRC NOTICE OF VIOLATION 88-28-02 AND GPC RESPONSE

2. Procedure 46002-C, "Control and Accountability of Radioactive Sources", was revised May 13, 1988, (Rev. 10) to include the following:
 - a. Radioactive sources, including check sources, will be used or handled only by or under the direction of HP personnel in accordance with Procedure 43007-C.
 - b. When the source inventory is performed, HP normal storage areas shall be inventoried for any additional source(s), other than those specified in those locations. Any sources improperly located will be returned to their proper location and HP supervision notified.
 - c. The removal of any radioactive symbol or label (and/or any cover containing a radioactive symbol or label) from equipment or material shall be performed by or under the direction of HP personnel.
 - d. Source accountability records will be promptly updated whenever a source storage location is changed.
3. Procedure 43007-C was revised April 26, 1988, (Rev. 8) to include the following:
 - a. Maintenance Work Orders (MWO's) will be revised for handling or relocation of a radioactive source, and a Radiation Work Permit (RWP) will be used when handling or moving a source, other than exempt quantities. Plant Effluent Radiation Monitor System (PERMS) sources will not be treated as exempt quantities and will require an RWP.
 - b. Radioactive sources may be used or handled only by or under the direction of HP personnel.
4. Procedure 00851-C, "Storage, Handling and Shipping Requirements", was revised September 2, 1988, (Rev. 6) to include the following:
 - a. Storage of radioactive materials will be under the direction of Health Physics.
 - b. Radiation symbols, labels or covers containing the symbols or labels will be removed only by or under the direction of HP personnel.
5. HP initiated a Request for Engineering Review (RER 88-0304) for engineering personnel to perform an evaluation to determine if a tamper-proof method of installing process monitor sources is practical to aid HP in determining if a check source has been improperly moved. The RER was completed September 7, 1988, and it was determined that anti-tamper lacquer (Torque-Seal) could be used for PERMS check source mounting hardware.
6. Indicators were added by Change Order 540, August 7, 1988, to the Nuclear Plant Management Information System (NPMIS) database to alert work planners of special considerations involved in handling or relocating sources.
7. Procedure 29402-C, "Work Planning Group Work Order Processing", was revised August 23, 1988, (Rev. 4) to eliminate any confusion concerning HP review of an MWO.

ENCLOSURE 1 (Con't)

NRC NOTICE OF VIOLATION 88-28-02 AND GPC RESPONSE

8. Engineering performed an evaluation to determine the necessity and/or the feasibility of replacing any check source, if the activity level of the source that is sent exceeds the specification or exceeds ten (10) times the 10 CFR 20 Appendix C limits. The evaluation determined that the replacement of the PERMS sources would not be economically feasible with the minute amount of activity exceeding Appendix C limits.

Corrective steps which will be taken to avoid further violations:

It is anticipated that the aforementioned measures will preclude a recurrence of this incident.

Date when full compliance will be achieved:

Full compliance was achieved September 7, 1988.

ENCLOSURE 2

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
NRC NOTICE OF VIOLATION 88-28-03 AND GPC RESPONSE

VIOLATION 50-424/88-28-03

"Technical Specification 6.10.1 requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Plant Procedure 43532-C, 'Operation Use of Eberline PM-6 Portal Monitor', requires daily response checks of the PM-6 portal radiation monitor.

Contrary to the above, the licensee failed to perform a response check of the PM-6 portal monitor located outside the mini Plant Entrance and Security Building between Unit 1 and Unit 2 for the period June 19-21, 1988.

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

RESPONSE TO VIOLATION 50-424/88-28-03

Admission or denial of the alleged violation:

The violation occurred as stated.

Reason for the violation:

The violation occurred because Health Physics (HP) Calibration Technicians (a job categorization distinct from that of HP Technicians) were not authorized access to the mini-Plant Entrance and Security Building (PESB). This circumstance lead to a breakdown of continuity in the performance of this task. Further, first line supervision failed to adequately review paperwork associated with this task.

Corrective steps which have been taken and the results achieved:

1. A sufficient number of HP Calibration Technicians (HPCT) were authorized access to the mini-PESB access. This authorization ensured HPCTs have the opportunity to source check the Process Monitor 6 (PM-6).
2. Health Physics duty foremen and HP lead technicians were informed that if the calibration was not performed by HPCTs, the HP Technician performing the calibration in their stead would sign off the source check sticker on the PM-6, and an appropriate entry would be made on the HP duty foreman's sign off sheet. HP Technicians are fully qualified to perform the calibration check.

3. A shift briefing was held on the proper method to document activities associated with source checking an instrument.
4. A memorandum of discussion was issued on June 28, 1988, to HP foreman instructing them on the acceptable means of documenting work when alternate persons conduct a task and sign for another.
5. The PM-6 source check at the mini-PESB has been added to the HP Duty Foreman's Dayshift Checklist. This action provides further assurance that the task will not be missed in the future.
6. A memo was issued June 23, 1988, to HP personnel and foremen to re-emphasize procedure compliance.

Corrective steps which will be taken to avoid further violations:

It is believed that the aforementioned measures will preclude a recurrence of this incident.

Date when full compliance will be achieved:

Full compliance was achieved on June 30, 1988.