

Washington Public Power Supply System

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Docket No. 50-397

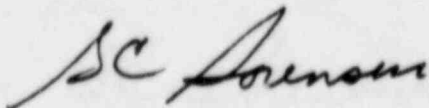
G02-86-221
March 14, 1986

Mr. J. B. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: NUCLEAR PLANT NO. 2
LICENSE NPF-21
NRC INSPECTION REPORT 86-02

The Washington Public Power Supply System hereby replies to the allegation contained in your letter dated February 14, 1986. Our reply consists of this letter and Appendix A (attached).

In Appendix A, an explanation of our evaluation regarding the allegation is provided. Should you have any questions concerning our response, please do not hesitate to contact me.



G.C. Sorensen
Manager, Regulatory Programs

GCS/JDH:mt

Attachment

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APPENDIX A

ALLEGATION

The following excerpts are taken from Paragraph 9 of NRC Inspection Report number 50-397/86-02: "NRC Region V received an allegation by telephone on July 18, 1985, from a licensee contractor employee regarding radiological working conditions. This is the summary of an ongoing inquiry initiated in August, 1985. The substance of the allegation was that the individual received unnecessary radiation exposure because he was told to remain in radiation areas within the turbine building and the reactor containment drywell to wait for additional work. ... Based on review of facts developed in this matter, the allegation is considered substantiated. Title 10, Code of Federal Regulation, Part 20.1 (c) states in part that, "persons engaged in activities under licenses issued by the Nuclear Regulatory Commission pursuant to the Atomic Energy Act of 1954 ... should, in addition to complying with the requirements set forth in this part, make every reasonable effort to maintain radiation exposures, and releases of radioactive materials in effluents to unrestricted areas, as low as is reasonably achievable. ..." This section admonishes each licensee to act in accordance with the ALARA principles. It appears, based on the results of inquiry into this allegation, that this goal was not achieved. This matter was brought to the licensee's attention so that they could take appropriate steps to prevent any recurrence."

SUPPLY SYSTEM RESPONSE

The Supply System has conducted an investigation of the above allegation. Our efforts have led us to conclude that our ALARA Program is effective and the probable motive for the allegation involves potential labor-management conflict. Our investigation consisted of interviews with five carpenters, two laborers and two supervisory personnel as well as extensive record reviews of Radiation Work Permits, exposure records, Maintenance Work Requests and contractor work logs.

The results of our interviews revealed that the foreman in question was, from a work management standpoint, one of the better foreman during the outage and was interested in getting in, getting the job done, and getting out. On the other hand, our interviews indicated that this foreman, although respected, was not well liked by all his men. This fact, we believe, was the cause for personal actions against the individual supervisor rather than deficiencies in the ALARA program. In either case, avenues are available within the Supply System to report such issues, e.g. direct reporting to upper management or anonymous reporting using the "hotline". However these resources were never utilized.

Our evaluation included a review of Radiation Work Permits (RWP), the associated Radiation Exposure Card (REC) entries, and corresponding contractor work logs. The time spent by carpenters and assisting laborers during erection and tear-down of scaffolding consistently matched work log times for these activities, i.e. personnel were in controlled areas only when scheduled to be there.