



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

April 22, 1998

William T. Cottle, President and
Chief Executive Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, Texas 77483

SUBJECT: NRC INSPECTION REPORT 98-02

Thank you for your letter of March 16, 1998, in response to our letter and Notice of Violation dated February 12, 1998. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Blaine Murray
for Blaine Murray, Chief
Plant Support Branch

Division of Reactor Safety

Docket Nos.: 50-498
50-499
License Nos.: NPF-76
NPF-80

cc:
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9804280234 980422
PDR ADOCK 05000498
G PDR

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-2-

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-3-

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DISTRIBUTION w/copy of licensee's letter dated March 16, 1998:

DCD (IE06)

Regional Administrator

STP Resident Inspector

DRS Director

DRS Deputy Director

DRP Director

DRS-PSB

Branch Chief (DRP/A)

MIS System

Project Engineer (DRP/A)

Branch Chief (DRP/TSS)

R. Bachmann, OGC (MS: 15-B-18)

RIV File

DRS Action Item File (98-G-0017) (Goines)

DOCUMENT NAME: R:_STP\STP802AK.MPS

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RIV:PSB <i>mb</i>	E	C:DRS\PSB							
MPShannon:nh		BMurray <i>BM</i>							
04/1/98		04/1/98							

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RIV:PSB	E	C:DRS\PSB						
MPShannon:nh		BMurray						
04/14/98		04/12/98						

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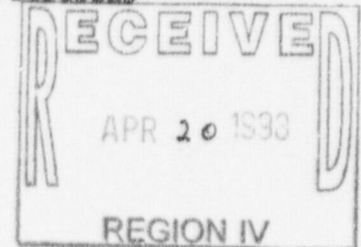
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South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

March 16, 1998
NOC-AE-000106
File No.: G02.04.02
10CFR2.201
STI: 30563825

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555



South Texas Project
Units 1 and 2
Docket Nos. STN 50-498; STN 50-499
Reply to Notices of Violation 9802-01, 9802-02, and 9802-04

South Texas Project has reviewed the Notices of Violation contained in inspection report 50-498; 499/98-02 dated February 12, 1998, and submits the attached reply. The only commitments contained in this correspondence are located in the Corrective Actions sections of the attachments.

If there are any questions regarding these replies, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7799.

A handwritten signature in cursive script, appearing to read "J. R. Lovell".
J. R. Lovell
Manager Generation Support

WEM/wem

Attachments: A. Reply to Notice of Violation 9802-01
B. Reply to Notice of Violation 9802-02
C. Reply to Notice of Violation 9802-04

ST-NOC-AE-000106

File No.: G02.04.02

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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
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Attachment A
NOC-AE-000106
Page 1 of 2

Reply to Notice of Violation 9802-01

I. Statement of Violation:

During an NRC inspection conducted on January 12-15, 1998, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

10 CFR 19.12(a) states, in part, that all individuals who in the course of employment are likely to receive in a year an occupational dose in excess of 100 millirems shall be kept informed of the storage, transfer, or use of radiation and/or radioactive material.

Contrary to the above, radiation workers who were likely to receive an occupational dose in excess of 100 millirems per year were not informed of the presence of airborne radioactivity. Specifically, on September 23 and September 28, 1997, workers in the Unit 1 Reactor Containment Building and Unit 1 reactor cavity area, respectively, were not informed that they were working in an airborne radioactivity area.

This is a Severity Level IV violation (Supplement IV) (50-498/9802-01).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The cause of this event was a lack of established guidelines as to when workers should be informed of changing conditions.

IV. Corrective Actions:

1. Revise procedure OPRP07-ZR-0010, Radiation Work Permits, to stipulate that persons logged in on an RWP at the time it is revised to change protective measures shall be notified of the change as soon as practicable. This action will be completed by 4/15/98.
2. Revise procedure OPRP04-ZR-0015, Radiological Postings and Warning Devices, to state that personnel located within an area where posting changes occur shall be notified of the change as soon as practicable. This action will be completed by 4/15/98.

Attachment A
NOC-AE-000106
Page 2 of 2

V. Date of Full Compliance:

Plant procedures require revisions be made, as necessary, to the Radiation Work Permit during changing conditions which will keep workers informed of these changes. South Texas Project is in full compliance.

Attachment B
NOC-AE-000106
Page 1 of 2

Reply to Notice of Violation 9802-02

I. Statement of Violation:

During an NRC inspection conducted on January 12-15, 1998, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

Technical Specification 6.11.1 states, in part, that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

10 CFR 20.1501 (a) states, in part, that each licensee shall make or cause to be made, surveys that may be necessary for the licensee to comply with the regulations in this part and are reasonable under the circumstances to evaluate concentrations or quantities of radioactive material and the potential radiological hazards that could be present.

Radiation Protection Procedure OPGP03-ZR-0050, "Radiation Protection Program," Revision 1, Section 4.6.4, states, in part, "Job coverage, or specific surveys, shall be of the type and frequency... to assess the extent of... concentrations of radioactive materials and the potential radiological hazards to which workers may be exposed."

Contrary to the above, between 3:40 p.m. on September 22, and 12:15 a.m. on September 23, 1997, airborne radioiodine activity surveys were not performed in Unit 1 Reactor Containment Building to assess the extent of concentrations of radioactive material, and the potential radiological hazards to which workers may have been exposed.

This is a Severity Level IV violation (Supplement IV) (50-498/9802-02).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The cause of the failure to perform air sampling sufficient to identify airborne radioiodine in the reactor containment was the decision to stop sampling based on historical and recent sample results without consideration of the remaining source term and plant configuration changes that could result in increased airborne radioactivity. Additionally, the absence of specific plans to use continuous air monitoring equipment contributed to the staff's inability to become aware of changing radiological conditions.

Attachment B
NOC-AE-000106
Page 2 of 2

IV. Corrective Actions:

1. Health Physics resumed routine sampling for radioiodine on the morning of 9/23/97 and continued for the duration of the refueling outage.
2. This event will be covered in Health Physics continuing training prior to the next refueling. This action will be completed by 10/1/98.
3. Procedure OPRP04-ZR-0013, "Radiological Survey Program," will be revised to include guidance on the use of plant radiation monitoring system to monitor changes in radiological conditions and also to provide for use of local continuous monitoring equipment. This action will be completed by 4/15/98.

V. Date of Full Compliance:

Required sampling is being performed in all areas of the station. South Texas Project is in full compliance.

Attachment C
NOC-AE-000106
Page 1 of 2

Reply to Notice of Violation 9802-04

I. Statement of Violation:

During an NRC inspection conducted on January 12-15, 1998, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 7.e.3, recommends procedures for airborne radioactivity monitoring.

Radiation Protection Procedure OPRP04-ZR-0015, "Radiological Posting and Warning Devices," Revision 3, Section 2.2, states, in part, "STP (South Texas Project) will post airborne radioactivity areas at 0.25 DAC or greater."

Contrary to the above, from 11:07 p.m. until 11:45 p.m. on September 28, 1997, the Unit 1 reactor cavity was not posted as an airborne radioactivity area when airborne radioactivity sample results revealed that the airborne radioactivity was greater than 0.25 DAC.

This is a Severity Level IV violation (Supplement IV) (50-498/9802-04).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

Contrary to procedure OPRP04-ZR-0015, which requires posting airborne radioactivity areas at 0.25 DAC or greater, the reactor cavity was not posted when there was data indicating that the airborne radioactivity concentration exceeded 0.25 DAC. The procedure does not provide for delay in posting until confirmatory measurements are taken.

IV. Corrective Actions:

1. Communicate in Health Physics continuing training that actions will first be taken to post airborne radioactivity areas based on available sample results and that confirmatory measurements will follow posting in priority. This action will be completed by 6/15/98.

Attachment C
NOC-AE-000106
Page 2 of 2

V. Date of Full Compliance:

Airborne radioactivity areas are properly posted. South Texas Project is in full compliance.