

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Bart D. Withers
President and
Chief Executive Officer

January 4, 1988

WM 87-0352

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

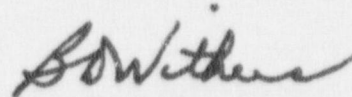
Reference: Letter dated 12/03/87 from L. J. Callan, NRC, to
B. D. Withers, WCNOC
Subject: Docket No. 50-482: Response to Violation 482/8728-01

Gentlemen:

Attached is a detailed response to violation 482/8728-01 which was documented in the Reference. Violation 482/8728-01 concerns a failure to properly evaluate certain survey results during the assessment of radiation exposure of two workers.

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/llk

Attachment

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

8801110331 830104
PDR ADDCK 05000482
Q PDR

IE06
1/1

Violation (482/8728-01): Failure to Perform Radiological Surveys

Finding:

10 CFR Part 20.201(b) requires that licensees shall make or cause to be made such surveys as: (1) may be necessary for the licensee to comply with the regulations in this part and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR Part 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, the NRC inspector determined on October 26, 1987, that the licensee failed to properly evaluate certain survey results during the assessment of radiation exposure to the skin of the whole body and extremities of two workers.

Reason For Violation

Two health physics technicians from another utility providing additional health physics support during the Wolf Creek Generating Station second refueling outage performed the surveys through the protective clothing that the workers were wearing. Procedure HPH 03-014 contains a step requiring a survey be performed on the skin if contamination is found on the clothing. The same procedure also states that if contamination is such that it may spread enroute to the decontamination area, the worker may have to don protective clothing to prevent the spread. The two health physics technicians did have the workers remove their personal clothing and then don protective clothing to get to the decontamination area. As there was not a controlled copy of HPH 03-014 at the decontamination area they missed the step requiring a survey be performed on the skin and submitted an initial survey sheet for each individual showing the readings through the protective clothing.

Corrective Steps Which Have Been Taken and Results Achieved:

A cabinet containing decontamination supplies and a controlled copy of HPH 03-014 has been located at the decontamination area.

Conversations with the support health physics technicians and WCNOC health physics technicians were held stressing the importance of following procedures and paying attention to detail.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

Procedure HPH 03-014, "Personnel Decontamination" is being revised to include a statement on the Personnel Decontamination Record to remove clothing and survey the skin underneath for clothing contamination and Hot Particle contamination incidents.

A review of this incident has been included in the health physics technician training program which will commence on January 4, 1988, and conclude on March 11, 1988. The lesson plan for this training contains a description of the incident and describes why proper surveys are required. Health physics technicians working shift will be attending these classes.

Date When Full Compliance Will Be Achieved:

The above mentioned health physics technician training and the revision to procedure HPH 03-314 will be completed by March 11, 1988. The other corrective actions taken as a result of this event have been completed.