

MAR 27 1989

In Reply Refer To:
Docket: 50-382/88-30

Louisiana Power & Light Company
ATTN: J. G. Dewease, Senior Vice President
Nuclear Operations
317 Baronne Street
New Orleans, Louisiana 70160

Gentlemen:

Thank you for your letter of March 9, 1989, in response to our letter and Notice of Violation dated February 8, 1989. 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,

Original Signed By
L. J. Callan

L. J. Callan, Director
Division of Reactor Projects

cc:
Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Vice President
Nuclear Operations
P.O. Box B
Killona, Louisiana 70066

Louisiana Power & Light Company
ATTN: N. S. Carns, Plant Manager
P.O. Box B
Killona, Louisiana 70066

(cc's continued)

RIV:FRPS:RPB
LRicketson/slr
3/23/89

C:SEPS:RPB
RBAer
3/23/89

C:RPB
DMurray
3/23/89

C:RPS/A
Chamberlain
3/24/89

D:DRP
Callan
3/27/89

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Louisiana Power & Light Company

-2-

Louisiana Power & Light Company
ATTN: R. F. Burski, Manager, Nuclear
Safety & Regulatory Affairs
317 Baronne Street
P.O. Box 60340
New Orleans, Louisiana 70160

Louisiana Power & Light Company
ATTN: L. W. Laughlin, Site
Licensing Support Supervisor
P.O. Box B
Killona, Louisiana 70066

Louisiana Power & Light Company
ATTN: G. M. Davis, Manager, Events
Analysis Reporting & Response
P.O. Box B
Killona, Louisiana 70066

Middle South Services
ATTN: Mr. R. T. Lally
P.O. Box 61000
New Orleans, Louisiana 70161

Louisiana Radiation Control Program Director

bcc to DMB (IE06)

bcc w/licensee's letter:
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Lisa Shea, RM/ALF
Resident Inspector
Section Chief, DRP/A
DRP
RPB-DRSS
DRS
MIS System
RSTS Operator
RIV File
Inspector
Section Chief
B. Murray
R. L. Bangart
R. E. Hall
Project Engineer, DRP/A
D. Wigginton, NRR Project Manager



LOUISIANA
POWER & LIGHT

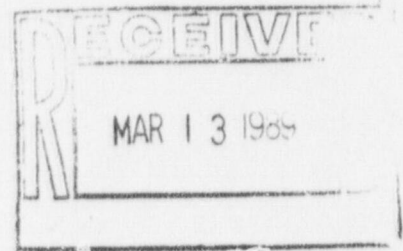
317 BARONNE STREET • P. O. BOX 60340
NEW ORLEANS, LOUISIANA 70160 • (504) 595-3100

March 9, 1989

W3P89-0047
A4.05
QA

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 88-30



Gentlemen:

In accordance with 10 CFR Part 2.201, Louisiana Power & Light hereby submits in Attachment 1 the response to the Violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning this response, please contact T.J. Gaudet at (504) 464-3325.

Very truly yours,

R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB:TJG:ssf

Attachment

cc: R.D. Martin, NRC Region IV
J.A. Calvo, NRC-NRR
D.L. Wigginton, NRC-NRR
NRC Resident Inspectors Office
E.L. Blake
W.M. Stevenson

8-9032 00344 310

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ATTACHMENT 1

LP&L Response to the Violation Identified in Appendix A
of Inspection Report 88-30

VIOLATION NO. 8830-01

Overexposure to the Skin of the Whole Body

10 CFR Part 20.101(a) requires, in part, that "...no licensee shall possess, use, or transfer licensed material in such a manner as to cause any individual in a restricted area to receive in any period of one calendar quarter from radioactive material and other sources of radiation a total occupational dose in excess of ... (7½ Rems per calendar quarter to the skin of the whole body)."

Contrary to the above, the NRC inspectors determined during a review of Licensee Event Report 88-10, dated June 16, 1988, and subsequent onsite inspection on December 22, 1988, that two individuals had received radiation exposures to the skin of the whole body of 22 and 18 rems on May 16 and 18, 1988, respectively, from radioactive fuel particles.

This is a Severity Level IV violation.

RESPONSE

(1) Reason For The Violation

LP&L admits this violation in that two individuals did receive radiation exposures to the skin of the whole body greater than the quarterly occupational dose allowed by 10CFR20.101. LP&L attributed the violation's root cause to shift Health Physics personnel failing to establish work areas as hot particle zones during cavity evolutions.

Health Physics Administrative Procedure HP-1-241, "Hot Particle Contamination Control", provides the guidelines at Waterford 3 to minimize personnel exposure from hot particle contamination. It defines three hot particle area designations to assist in controlling hot particle contamination and personnel exposure to hot particles. Zone 1 Hot Particle Areas are areas which are not expected to become contaminated with hot particles, but warrant specific hot particle contamination surveys to verify hot particle controls. Zone 2 Hot Particle Areas are areas that are maintained free of hot particle contamination, but have a potential for becoming contaminated with hot particles. A Zone 2 Hot Particle Area primarily serves as a buffer zone between Zone 3 Hot Particle Areas and other areas. Zone 3 Hot Particle Areas are those that are either known or suspected to be contaminated with hot particles. Hot particle surveys are performed twice per shift in Zones 2 and 3 during either maintenance or operational activities. Also, personnel working in Zone 3 Areas periodically monitor for hot particles and log into and out of the

Zone 3 Areas. In both the May 16 and 18, 1988, events, the contaminated individuals worked in areas demonstrated free of hot particles during prior surveys. Health Physics had designated these work areas, which were adjacent to Zone 3 Areas, as Zone 2 areas. Had the areas been designated as Zone 3 before these events, hot particle monitoring of personnel could have detected the particles before the personnel exceeded the allowed exposure.

(2) Corrective Steps That Have Been Taken And The Results Achieved

Both individuals were decontaminated in accordance with the proper methods established in Health Physics Procedure HP-02-704, "Personnel Decontamination". Formal dose assessments were performed on each as required by Health Physics Procedure HP-2-101, "Dosimetry Problem Reports".

Following the discovery of the source of the second individual's contamination on May 18, 1988, LP&L curtailed work in the area surrounding the reactor cavity until extensive hot particle surveys could be completed. Designated personnel surveyed the entire Reactor Containment Building +46 foot level and the top portion of the reactor cavity and later upgraded contamination controls in these areas. It should be noted that the hot particles stayed within the Radiologically Controlled Area. Throughout the remainder of the refueling outage, no additional personnel overexposures because of hot particles occurred.

The Operations Health Physics Technicians received refresher training on HP-1-241 which included the importance of appropriately establishing hot particle contamination controls.

(3) Corrective Steps Which Will Be Taken To Avoid Further Violations

Based on the above information, LP&L feels that the necessary steps have been taken to ensure that this type of violation does not recur.

(4) Date When Full Compliance Will Be Achieved

LP&L is currently in full compliance.

FEB 8 1989

In Reply Refer To:
Docket: 50-382/88-30

Louisiana Power & Light Company
ATTN: J. G. Dewease, Senior Vice President
Nuclear Operations
317 Baronne Street
New Orleans, Louisiana 70160

Gentlemen:

This refers to the inspection conducted by Messrs. H. Chaney and L. Ricketson of this office during the period December 19-23, 1988, of activities authorized by NRC Operating License NPF-38 for the Waterford Steam Electric Station, Unit 3, and to the discussion of our findings with Mr. D. Packer and other members of your staff at the conclusion of the inspection on December 23, 1988.

Areas examined during the inspection included occupational radiation exposure and transportation programs. The NRC inspectors also examined the circumstances surrounding the overexposure of two individuals in May 1988, and the issuance of several violations of NRC and Department of Transportation (DOT) regulations by the state of Nevada in June 1988. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the NRC inspectors. The inspection findings are documented in the enclosed inspection report.

During this inspection, it was found that certain of your activities, were in violation of NRC requirements. These violations involving hot particles could individually be classified at a Severity Level III because the exposure exceeded the regulatory limit. However, the health implication of each of the exposures is minimal due to the small area of the skin involved. Therefore, we have classified these events as a Severity Level IV violation. We also note the following actions on the part of LP&L: (1) prompt identification and reporting of the event to the NRC, (2) was not willful, (3) at the time of the event, you had in place implementation of a hot particle control program in response to industry problems and these incidents do not represent a breakdown in management control, and (4) to this point and thereafter maintained exposures due to hot particles below regulatory limits.

You are required to respond to the above noted violation, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

RIV:FRPS:RPB
HJChaney
2/1/89

C:FRPS
REBaer
2/1/89

C:RPB
BMurray
2/1/89

C:PSA
DDChamberlain
2/1/89

D:ORH:AK
L. Chaney
2/2/89

EO:GFS
GSamborn
2/2/89

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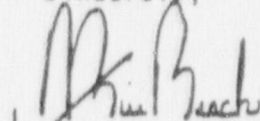
We also reviewed two state of Nevada identified violations of transportation requirements involving waste shipments to Beatty, Nevada. These violations were identified as an Unresolved Item (382/8820-02) in NRC Inspection Report 50-382/88-20. We note that these violations have already been the subject of enforcement action by the state of Nevada. No civil penalty was assessed by the state of Nevada for the violations, but your authority to utilize the Beatty, Nevada radioactive waste burial facility was suspended until you reestablished compliance with transportation and state of Nevada requirements. In view of the enforcement action already taken by the State, and based on a review of the specifics of the violations and your expedient actions to correct the problems and in accordance with the discretionary powers authorized by the NRC enforcement policy (10 CFR Part 2, Appendix C, 1988), we have decided not to take any further enforcement actions concerning these violations. Your corrective actions to the aforementioned violations appear to be suitable to prevent a recurrence of the violations in the future. You will not be required to respond to these transportation violations.

We have also examined actions you have taken with regard to previously identified inspection findings. The status of these items is identified in paragraph 2 of the enclosed report.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-311.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



L. J. Callan, Director
Division of Reactor Projects

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
50-88-30
3. Attachment - Radiation Exposure Expenditures for Selected
Radiological Work Operations During Cycle 2 Refueling Outage

cc w/enclosures:

Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Vice President
Nuclear Operations
P.O. Box B
Killona, Louisiana 70065

(cc's continued)

Louisiana Power & Light Company

-3-

Louisiana Power & Light Company
ATTN: N. S. Carns, Plant Manager
P.O. Box B
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Louisiana Power & Light Company
ATTN: R. F. Burski, Manager, Nuclear
Safety & Regulatory Affairs
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Louisiana Power & Light Company
ATTN: L. W. Laughlin, Site
Licensing Support Supervisor
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Louisiana Power & Light Company
ATTN: G. M. Davis, Manager, Events
Analysis Reporting & Response
P.O. Box B
Killona, Louisiana 70066

Middle South Services
ATTN: Mr. R. T. Lally
P.O. Box 61000
New Orleans, Louisiana 70161

Louisiana Radiation Control Program Director

bcc to DMB (IE06)

bcc distrib. by RIV:

*RRI

*Section Chief (DRP/A)

*RPB-DRSS

*Project Engineer, DRP/A

*RIV File

*D. Wigginton, NRR Project Manager (MS: 13-D-18)

Lisa Shea, RM/ALF

*RBangart

*RHall

*BMurray

*BNicholas

*R. D. Martin, RA

*DRP

*MIS System

*RSTS Operator

*DRS

*w/766

APPENDIX A

NOTICE OF VIOLATION

Louisiana Power & Light Company
Waterford Steam Electric Station No. 3

Docket: 50-382
License: NPF-38

During an NRC inspection conducted during December 19-23, 1988, a violation of NRC requirements was identified. The violation involved radiation overexposures to the skin of the whole body of two workers. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

Overexposure to the Skin of the Whole Body

10 CFR Part 20.101(a) requires, in part, that ". . . no licensee shall possess, use, or transfer licensed material in such a manner as to cause any individual in a restricted area to receive in any period of one calendar quarter from radioactive material and other sources of radiation a total occupational dose in excess of . . . (7½ Rems per calendar quarter to the skin of the whole body)."

Contrary to the above, the NRC inspectors determined during a review of Licensee Event Report 88-10, dated June 16, 1988, and subsequent onsite inspection on December 22, 1988, that two individuals had received radiation exposures to the skin of the whole body of 22 and 18 rems on May 16 and 18, 1988, respectively, from radioactive fuel particles.

This is a Severity Level IV violation. (Supplement IV) (382/8830-01)

Pursuant to the provisions of 10 CFR 2.201, Louisiana Power & Light Company is hereby required to submit a written statement or explanation to this office within 30 days of the date of the letter transmitting this Notice. This reply should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 8th day of February 1989

50-382-210548-4