

# CATEGORY 1

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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.

DOCKET #  
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 05000270  
 05000287

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 MCCULLOM, W.R. Duke Power Co.  
 RECIP. NAME RECIPIENT AFFILIATION

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SUBJECT: Responds to NRC 971106 ltr re violations noted in insp repts  
 50-269/97-12, 50-270/97-12 & 50-287/97-12, respectively.  
 Corrective actions: performed radiological survey & found no  
 spread of contamination & counseled test technicians.

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November 5, 1997

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

Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/97-12  
Reply to Notice of Violation

Gentlemen:

By letter dated October 6, 1997, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/97-12, 50-270/97-12, and 50-287/97-12.

Duke Power acknowledges this violation. Accordingly, Duke has taken corrective actions, as described in the attachment, to address the root cause.

Pursuant to the provisions of 10 CFR 2.201, the attachment provides written response to the violation as identified in the subject Inspection Report.

Very truly yours,

W. R. McCollum, Jr.  
Site Vice President  
Oconee Nuclear Station

Attachment

9711170072 971105  
PDR ADOCK 05000269  
Q PDR



NRC Document Control Desk

November 5, 1997

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cc: Mr. L. A. Reyes, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II

Mr. D. E. LaBarge, Project Manager  
Office of Nuclear Reactor Regulation

Mr. M. A. Scott  
Senior Resident Inspector  
Oconee Nuclear Site

Attachment 1  
Reply to Notice of Violation  
Violation 97-12-05 (Reply)

Restatement of the Violation

During a NRC inspection conducted from July 27 to September 6, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

10 CFR Part 20.1101(a) states that each licensee shall develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of this part.

System Radiation Protection Manual, which implements 10 CFR Part 20.1101(a), Procedure I-13, Use of Protective Clothing and Related Equipment, Revision 2, requires personnel removing protective clothing to remove booties as you transfer to the step-off pad which is clean.

Contrary to the above, on August 27, 1997, test technicians exited a contaminated area without removing booties as they transferred to the step-off pad.

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

RESPONSE:

1. The reason for the violation:

Duke Power acknowledges the violation.

A detailed root cause analysis was performed for this event. The cause of the event was a failure to follow procedure because of a human error. The Operations Test Group (OTG) technicians made an inappropriate decision on the appropriate actions for frequent entry and exit into a contaminated

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Radiation Control Zone (RCZ). This decision was inappropriate because it was contrary to System Radiation Protection Manual, Procedure I-13, Use of Protective Clothing and Related Equipment.

The routine procedure PT/3/A/202/11, "HPI Pump Test", requires contacting the Unit 3 Control Room for starting and stopping pumps. The telephone in the High Pressure Injection (HPI) pump room is located outside the RCZ. Once the HPI pump is started, a wait is required for the pump parameters to stabilize before testing. Therefore, the OTG technicians wait outside the RCZ and away from the pumps.

In the past, with a Radiation Protection (RP) technician monitoring for contamination, the OTG technicians have been allowed to remove only their outer rubber gloves and shoe covers and walk across the step-off pad to use the telephone. The RP technician would monitor the technicians reentry into the RCZ and reuse of their old rubber gloves and shoe covers. This would be a deviation from the Standing Radiation Work Permit (SRWP) and would be documented on the reverse side of the SRWP or recorded in the Shift Log book. However, in this event, RP was not consulted when the decision was made to deviate from the SRWP requirements. The OTG technicians believed that the decision to remove the rubber gloves and shoe covers, walk across the step-off pad and reenter the RCZ and then replace the original rubber gloves and shoe covers, was appropriate based on past experience.

2. The corrective steps that have been taken and the results achieved:

A radiological survey of the surrounding area was performed and no spread of contamination was discovered.

Operations Test Group management has counseled the test technicians on the following points:

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- The importance of direct communication with RP to ensure that RP understands all aspects of the job to be performed.
- The importance of fully understanding and complying with RP directions and (S)RWP requirements.
- The understanding that an acceptable radiological practice in one instance may not be an acceptable practice in another situation.
- Any deviation from (S)RWP requirements is allowed only under the direction of RP.

Job observations have been performed by OTG management to ensure the SRWPs are being followed.

The OTG management has discussed this issue with all OTG technicians. The OTG technicians are all aware of the expectations and have demonstrated compliance with the radiological requirements.

A site wide "stop work" was conducted to emphasize to all site employees the importance of proper radiological work practices. Each site employee was given a summary of this event and related recent events which constituted poor examples of RP work practices. Accordingly, site management's expectations for program compliance were re-emphasized.

Ocone Management job observations, which emphasize procedure adherence, are performed periodically and include observations on radiological program compliance. These job observations indicate compliance with radiological requirements.

3. The corrective steps that will be taken to avoid further violations:

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The corrective actions that have been completed will avoid further violations and no additional corrective actions are planned. No regulatory commitments are contained in this Reply to Notice of Violation.

4. The date when full compliance will be achieved:

Duke Power is in full compliance.