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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

DESIGNATED ORIGINAL

Certified By Norma Garcia

Docket No. 50-397

July 17, 1987  
G02-87-219

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 NO. NPF-21  
NRC INSPECTION REPORT 87-14

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 19, 1987. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

In Appendix A, an explanation of our position regarding the validity of the violation is provided.

Should you have any questions regarding our response, please do not hesitate to contact me.

*AC Sorensen*

G. C. Sorensen  
Manager, Regulatory Programs

GCS:ac

Enclosures

cc: NRC Resident Inspector (MD 901A)  
Mr. R. B. Samworth

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APPENDIX A

During an NRC inspection conducted on May 13 - May 22, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

- A. Technical Specifications, Section 6.12, "High Radiation Areas," requires that each area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area.

Contrary to the above, on May 13, 1987, and again on May 18, 1987, the personnel access doorway leading into the recirculation pump work tent, located on the 467' level of the Radwaste Building, had whole body radiation levels up to 300 mrem/hr and was not conspicuously posted as a high radiation area in that the posting was on a dangling piece of yellow and magenta rope and could not be seen because the sign was open against a wall surface.

This is a Severity Level IV Violation (Supplement IV)

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

Immediate action was taken to conspicuously post the area.

Corrective Action to be Taken

1. Appropriate postings were provided at this location. Personnel authorized to work in the area had not been consistent about replacing the barrier after entrance and egress. A letter from the Plant Manager to all station personnel will be issued to discuss this violation and restate each employee's responsibility in ensuring that plant postings are maintained.
2. An evaluation will be performed to consider other methods of posting.

Date of Full Compliance

Corrective action will be complete prior to August 31, 1987.



- B. 10 CFR Part 20.023(b), "Caution Signs, Labels, Signals, and Controls," requires that each area in which a major portion of the body could receive in any one hour a dose in excess of 5 mrem, or any five consecutive days a dose in excess of 100 mrem shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "Caution - Radiation Area."

Contrary to the above, on May 13, 1987, the north personnel access doorway leading into the east "valve gallery" area of the Radwaste Building, 467' level, had whole body radiation levels up to 10 mrem/hr, was not conspicuously posted as a radiation area in that the posting was on a swing gate and could not be seen because the sign was open against a wall.

This is a Severity Level IV Violation (Supplement IV)

Validity of Violation

The Supply System acknowledges the validity of this violation.

Corrective Steps Taken/Results Achieved

Immediate action was taken to replace the swing gate with a permanent barrier.

Corrective Action To Be Taken

1. Although appropriate postings had been provided, personnel authorized to work in the area had not been consistent in replacing the barrier after entrance and egress. A letter from the Plant Manager to all station and contractor personnel will be issued to discuss this violation and restate each employee's responsibility in ensuring that plant postings are maintained.
2. An evaluation will be performed to consider other methods of posting.

Date of Full Compliance

Corrective action will be complete prior to August 31, 1987.

- C. Technical Specifications, Section 6.8.1, reads in part:  
"Written procedures shall be established, implemented and maintained covering the activities below: (a) The applicable procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, Appendix A, Item 7.e.(1) through (9) lists examples of radiation protection procedures required for controlling radioactivity.



Plant Procedures Manual (PPM) 11.2.15.4, paragraph 11.2.15.4.6, Revision 2, dated September 4, 1985, states: "Record all conditions of clothing contamination and decon or lack of decon in the Health Physics Log Book for future use with Corporate Policy and Procedure (CPP) 1.4.416, Loss of Personal Property." Additionally, Health Physics Program Description (HPD) procedure 3.1.15.4. states: "All personnel contaminations shall be documented."

Contrary to the above, conditions of clothing contaminations occurring on June 8, 1986, August 1, 1986, May 9, 1987 and May 10, 1987, were not documented in the Health Physics log book.

#### Validity of Violation

The Supply System acknowledges the validity of this violation.

#### Corrective Steps Taken/Results Achieved

All cases of clothing contamination are now recorded on a Clothing Contamination Report Form.

#### Corrective Action to be Taken

Revisions to the Plant Procedure Manual (PPM) are in progress to develop action levels and methods of dose assessment for cases of personnel clothing and skin contamination.

#### Date of Full Compliance

Corrective Action will be complete prior to December 31, 1987.