



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 29, 1988  
G02-88-170

Docket No. 50-397

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

Gentlemen:

Subject: NUCLEAR PLANT NO. 2  
LICENSE NO. NPF-21  
NRC INSPECTION REPORT 88-22

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 29, 1988. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendices A and B (attached).

In Appendix A, an explanation of our position regarding the validity of the violation is provided. As requested by your transmittal letter, Appendix B consists of actions taken to assure that analyses of future operational events are more thorough.

Should you have any questions, please contact Mr. A. G. Hosler, Manager, WNP-2 Licensing.

Very truly yours,

G. C. Sorensen, Manager  
Regulatory Programs

JDA/bk  
Attachments

cc: JB Martin - NRC RV  
NS Reynolds - BCP&R  
RB Samworth - NRC  
DL Williams - BPA  
NRC Site Inspector - 901A

~~8808030292~~ SPP

## APPENDIX A

During an NRC inspection conducted on June 6-9, 1988, two 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 violations are listed below:

### A. Technical Specification 6.12.1 states, in part:

"...each high radiation area in which the intensity of radiation is greater than 100 mrem/h but less than 1000 mrem/h shall be barricaded and conspicuously posted as a high radiation area...

"...Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received..."
- "c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device..."

Contrary to the above, on May 12, 1988, an individual entered an area on the 437' elevation of the Radwaste Building, where the intensity of radiation measured up to 1000 mrem/h, without being accompanied or provided with the equipment specified above.

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

### Validity of Violation

The Supply System acknowledges the validity of the violation.

### Corrective Steps Taken/Results Achieved

1. The door allowing access to the area was closed and locked immediately following a determination that the Supply System interpretation of Technical Specification 6.12.2 was incorrect (see response to Item B).
2. The individual involved was counseled by Supervision on the procedural compliance aspects of entering High Radiation Areas.

3. Operations department shift personnel were given supplemental instructions regarding posting and entry requirements for high and high-high radiation areas. These instructions were administered through shift safety meetings and completed by June 10, 1988.
4. The five week Operator Requalification Training Program, completed on July 18, 1988, included a revised module addressing the requirements for entry into high and high-high radiation areas.
5. The applicable RWP (2-88-00004, Operations Department Routines) was revised to include a statement of the requirements for entry to High Radiation Areas.

Corrective Action to be Taken

1. Training material will be developed and presented during Operations Department safety meetings to emphasize the significance of posted areas and requirements of entry.
2. The General Employee Training module will be reviewed and, if necessary, revised to ensure other personnel receive training similar to that of Operations personnel. This commitment is made because of a Plant Quality Assurance survey which was conducted to provide an indication of the level of knowledge of Plant personnel regarding radiation barriers. The results of the survey indicated that many of the survey population did not have a clear understanding of "High" Radiation Areas, "High-High" Radiation Areas and Area Radiation Monitors (ARMS).

Date of Full Compliance

October 31, 1988

B. Technical Specification 6.12.2 states, in part:

"...For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrem\*\*\* that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device..."

Contrary to the above, on June 8, 1988, an area existed within the Waste Collector Tank Room on the 437' elevation of the Radwaste Building, where the intensity of radiation accessible to a major portion of the body measured up to 1450 mR/hr, and the room was provided with a door which was not locked nor had an enclosure which could have been reasonably constructed for the purpose of locking been installed.

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

### Validity of Violation

The Supply System acknowledges the validity of the violation. However, it should be noted that a conscious decision was made to control access to the area by means of barricading, posting and a yellow flashing light, in lieu of locking the door or constructing an enclosure. The decision was based on our interpretation of Technical Specification 6.1.2 at the time, with the expectation being that sufficient controls were in place to control access.

### Corrective Steps Taken/Results Achieved

The door allowing access to the area was locked to fully comply with the intent of the Technical Specification.

### Corrective Action to be Taken

1. PPM 11.2.7.1, Area Posting, will be revised to more accurately reflect the intent of Technical Specification 6.12.2.
2. Health Physics personnel completed a Plant walkdown to identify areas accessible to personnel with dose equivalent rates in excess of 1000 mrem/hr. Three areas that are currently posted and barricaded, but not locked, were identified, including an overhead area of the 437' Radwaste Building and the East and West RWCU Pump Valve Galleries on the Radwaste 467' Level.

The 437' Level overhead area is adequately posted and barricaded, not subject to routine or frequent entry, and an enclosure cannot reasonably be constructed to prevent entry. No changes are anticipated.

A Maintenance Work Request has been issued to install locking gates on each of the RWCU Valve Gallery Rooms on the Radwaste 467' Level. Completion will establish full compliance with the Technical Specification.

### Date of Full Compliance

August 31, 1988

## APPENDIX B

As requested by your transmittal letter, the following is a description of those actions to assure that analyses of future operational events are more thorough.

1. Plant Procedure 1.3.48, "Root Cause Analysis," was recently approved (April 28, 1988) for use and presents five methods for evaluating Plant problems for the purpose of preventing recurrence.
2. The Licensing and Assurance Directorate is currently in the process of staffing a dedicated Root Cause Analysis Group. The Supply System has committed to provide a copy of the action plan to the NRC Resident Inspector describing implementation of group staffing and responsibilities by August 1, 1988.
3. Plant Procedure 11.2.19.1, "Investigation of Non-Reportable Radiological Occurrences," will be revised to include more specific guidance on performing root cause analyses for radiological occurrences.

Regarding the concern relating to frequency of system valve line-up verifications, System Operating Procedures (particularly those associated with radwaste operations) will be reviewed to identify those which should have a valve line-up performed prior to executing the procedure.

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 50-397/88-22.

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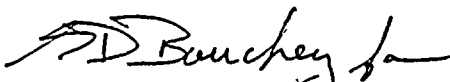
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NS Reynolds - BCP&R  
RB Samworth - NRC  
DL Williams - BPA  
NRC Site Inspector - 901A

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PDR ADOCK 05000397  
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