

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8904250078 DOC. DATE: 89/04/14 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project; Unit 2, Washington Public Powe 05000397
 AUTH. NAME: AUTHOR AFFILIATION
 BOUCHEY, G.D. Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 890316 ltr re violations noted in Insp Rept
 50-397/89-09.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME PD5 PD	COPIES LTTR ENCL 1 1	RECIPIENT ID CODE/NAME SAMWORTH, R	COPIES LTTR ENCL 1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	DEDRO	1 1
	NRR SHANKMAN, S	1 1	NRR/DEST DIR	1 1
	NRR/DLPQ/PEB 11	1 1	NRR/DLPQ/QAB 10	1 1
	NRR/DOEA DIR 11	1 1	NRR/DREP/EPB 10	1 1
	NRR/DREP/RPB 10	2 2	NRR/DRIS DIR 9A	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE JEBERMAN, J.	1 1	OGC/HDS2	1 1
	REG FILE 02	1 1	RGN5 FILE 01	1 1
INTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25

R
I
D
S
/
A
D
S

R
I
D
S
/
A
D
S



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 14, 1989
G02-89-061

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

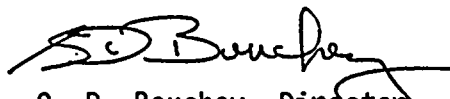
Gentlemen:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION REPORT 89-09
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated March 16, 1989. 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, the violation is addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,


G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

cc: JB Martin - NRC Rv
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

APR 17 1989
P12:05

~~8904250078~~ 3pp

APPENDIX A

D

During an NRC inspection conducted on February 21-24, 1989, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1988), as modified by 53 Fed. Reg. 40019 (October 13, 1988), the violation is listed below:

- A. 10 CFR 20.203, "Caution signs, labels, signals and controls," states, in part:

"(b) Radiation areas. Each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words:

"Caution...

"Radiation Area"

Contrary to the above, at approximately 2:00 p.m., PST, on February 23, 1989, a radiation area with dose rates up to 20 mrem per hour, located on the 522' elevation of the Reactor Building, was not conspicuously posted, in that the required sign located at the access point was lying face down on the floor such that it could not be read.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. A root cause analysis was performed and, although the reason for the posting being down could not be specifically identified, a significant contributing factor appears to be Supply System practice of posting such radiological controlled areas with a sign attached to a rope gate. The utilization of a stand-alone sign (conspicuously mounted or suspended) separate from the rope gate arrangement would likely have prevented this particular violation.

However, the Supply System also recognizes that the violation is a symptom of a broader programmatic issue as evidenced by previous radiological control violations. Accordingly, on-going corrective actions taken as a result of those violations are intended, on a long-term basis, to correct the problems noted. Currently, all line managers reporting to the Plant Manager have either trained or are in the process of training their personnel on radiological control requirements. In addition, the General Employee and Advanced Radiological Training Modules either have been or are scheduled to be revised to include additional emphasis on radiological control requirements. Primary emphasis will continue to be directed toward training personnel on the importance of understanding and complying with the fundamentals of the Health Physics Program.

Corrective Steps Taken/Results Achieved

1. The radiological posting was immediately restored to its correct configuration.
2. Plant Health Physics personnel are currently performing tours of the Plant each shift for the purpose of determining compliance with the radiological controls program (i.e., ensuring that radiologically controlled areas are properly posted). This practice will continue at least through the upcoming maintenance and refueling outage.

Corrective Action to be Taken

1. Conspicuous radiological postings that are independent of the access barrier will be provided at the entry to radiologically posted areas, unless there are restraints which prevent the additional posting.
2. At the completion of the outage the effectiveness of the Health Physics Plant tours will be evaluated and, if necessary, changes made accordingly.
3. An additional level of control for helping to ensure proper radiological postings will be applied by expanding the responsibilities of the Maintenance Work Control Supervisors, Area/Floor Coordinators and Plant Fire Tour personnel. Specifically, they will have an added responsibility of being attentive to improper postings (e.g., barriers left down) in the areas for which they are responsible and either correcting or reporting any deficiencies noted.
4. Plant Procedure (PPM) 11.2.7.2 "Entry Into, Conduct In and Exit From Radiological Controlled Areas", is currently in the process of being revised to better define responsibilities with regard to the radiological control program. The procedure is also being changed from a specific Health Physics procedure to a PPM, Volume I, administrative procedure (PPM 1.11.11).

Date of Full Compliance

Although the Supply System is currently in full compliance, further corrective action will be completed as follows:

1. The additional posting of radiological controlled areas will be completed by April 30, 1989.
2. The evaluation of the effectiveness of the Health Physics tours will be completed by July 31, 1989.
3. Additional responsibilities for Maintenance Craft Supervisors, Area/Floor Coordinators and Plant Fire Tour personnel will be defined by May 15, 1989.
4. PPM 1.11.11 will be issued by May 31, 1989.