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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

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April 11, 1990  
G02-90-074

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, OPERATING LICENSE NO. NPF-21  
NRC INSPECTION REPORT 90-01  
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated March 12, 1990. 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

~~9004200708~~ (3pp)

## APPENDIX A

During an NRC inspection conducted on January 29 - February 2, 1990, and February 12 - 16, 1990, 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, (1990), the violation is listed below:

A. 10 CFR 20.201, "Surveys.," states in part:

(a) As used in the regulations in this part, "survey" means an evaluation of the radiation hazards incident to...presence of radioactive materials...When appropriate, such evaluation includes...measurements of levels of radiation or concentrations of radioactive material present.

(b) Each Licensee shall make or cause to be made such surveys as...are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, on January 10, 1990, individuals were permitted to handle filter elements without prior or concurrent surveys of the levels of beta radiation. Subsequent surveys found removable levels of radioactive contamination from the filter elements ensuring up to 200 mrad per hour of beta radiation.

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

### Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was personnel performance based in that the Health Physics Technician involved failed to take appropriate actions to reduce the potential for the spread of contamination. Furthermore, radiological surveys taken by the technician were not performed or recorded in accordance with established procedures.

A contributing factor for this violation was that the pre-job coordination and briefings were less than adequate.



Corrective Steps Taken/Results Achieved

1. In addition to the initial cause analysis performed as part of the Radiological Occurrence Report (ROR) for this event, a formal Root Cause Analysis was performed for this violation. Several recommendations for improvements were identified and included 1) evaluating the Health Physics Program for enhancements in assessing radiological considerations during the work planning cycle, and 2) providing for increased supervisory overview of Health Physics work coverage.
2. All scheduled Radiation Work Permits (RWPs) are currently being reviewed by Health Physics supervision prior to implementation.
3. Increased emphasis is being applied in the area of supervisory overview of Health Physics work in progress to improve evaluation of personnel performance.

Corrective Action to be Taken

1. This violation and the results of the formal Root Cause Analysis will be discussed during Health Physics Technician meetings.
2. A complete job and task analysis was recently completed for the Health Physics Technician Training Program. The program, which is currently in the process of being revised, is being changed to be task-oriented (performance based) rather than theory based. Another improvement, that relates specifically to this violation, is that the new program will include training on the fundamentals and expectations of providing job coverage.
3. An overall evaluation of the Health Physics Program will be performed to determine if improvements need to be made in assessing radiological considerations during the work planning cycle. Included in the evaluation will be a review of the pre- and post-job review process.

Date of Full Compliance

Although the Supply System is currently in full compliance, the overall evaluation of the Health Physics Program (as it relates to work planning) will be completed by October 1, 1990.

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