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SUBJECT: Responds to NRC 900608 ltr re violations noted in Insp Rept
 50-397/90-10.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 6, 1990
G02-90-120
Docket No. 50-397

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


Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 90-10
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 8, 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

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PDR ADOCK 05000397
Q PDC

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APPENDIX A

During an NRC inspection conducted on April 9 - May 13, 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, the violation is listed below:

Section 6.12 of the WNP-2 Technical Specification, "High Radiation Areas," states 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, 1990, the access doorway to residual heat removal heat exchanger room "1A" on the 548 ft. elevation of the reactor building, which contained radiation levels up to 180 mrem/hr, was not barricaded and conspicuously posted as a high radiation area.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The reason for the violation was personnel performance based in that the Contractor Health Physics Technician involved failed to replace the barrier as required following removal of equipment from the heat exchanger room. The barrier had been wrapped up and tucked behind the door to the heat exchanger room to facilitate the removal and survey of equipment following work during the annual maintenance and refueling outage. A formal Root Cause Analysis (including an events and causal factors review) was performed which determined that the technician involved had been moving the equipment to a lower background area for surveying, and forgot to reinstall the barrier upon leaving the area. The room was not properly posted for a period of approximately 10 minutes.

The Supply System recognizes the importance of adherence to radiological controls, and implementation of the Health Physics Program is an area which requires additional management attention at WNP-2. Plant Management is currently developing a response to a Plant Quality Assurance Surveillance Report which will address this area of concern.

Corrective Steps Taken/Results Achieved

1. The posting was immediately restored to the correct position.
2. The Contractor Health Physics Technician involved was counselled on radiological posting requirements and performance expectations.
3. As a result of previous radiological posting violations, several improvements have since been made in this area. All line managers reporting to the Plant Manager have trained their personnel on radiological control requirements, and the General Employee and Advanced Radiological Training Modules have been revised to include additional emphasis on radiological control requirements.

Further improvements have also since been implemented with regard to radiological postings. These improvements, which were made in April 1989, included providing additional radiological postings at the entrances to several radiologically posted areas, unless there were restraints which prevented the additional posting. These additional postings are independent of the access barrier. Since this action has been taken, the number of posting problems identified has been significantly reduced (only two posting violations have occurred since the changes were made). These two violations were 1) a self-identified posting problem with an RWCU room which occurred during May 1989, and 2) this NOV where the barrier was left down at the entrance to the RHR Heat Exchanger Room.

Another improvement is that NRC Notices of Violation and in-house Radiological Occurrence Reports are discussed in the training programs for Supply System and Contractor Health Physics Technicians. This particular violation has been added to the list of those topics to be covered in the training program to further emphasize the importance of attention to detail.

Primary emphasis for improvement will continue to be directed toward training personnel on the importance of understanding and complying with the fundamentals of the Health Physics Program.

Corrective Action to be Taken

1. This violation and the formal root cause analysis will be discussed during Health Physics Technician safety meetings.
2. As stated in the referenced letter, increased emphasis will continue to be applied in the area of Health Physics supervisory overview of work in progress to improve evaluation of personnel performance.

Date of Full Compliance

Full compliance was achieved when the posting was restored to the correct position.