WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 21, 1990
G02-90-153

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 90-22
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated August 24, 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,

GD Bouchey

G. D. Bouchey, Director
Licensing & Assurance

JDA/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
PL Eng - NRR
DL Williams - BPA/399
NRC Site Inspector - 901A

APPENDIX A

During an NRC inspection conducted on August 8 - 10, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

> 10 CFR Part 20.103(a)(3) requires, in part, that for the purpose of determining compliance with the requirements of this section the licensee shall use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas and in addition, as appropriate shall use measurements of radioactivity in the body...as may be necessary for timely detection and assessment of individual intakes of radioactivity by exposed individuals. Furthermore, this part requires that when assessment of a particular individual's intake of radioactive material is necessary, intakes less than those which would result from inhalation for 2 hours in any one day or for 10 hours in any one week at uniform concentrations specified in appendix B, Table 1, Column 1 need not be included in such assessment, provided that for any assessment in excess of these amounts the entire amount is included.
>
> Contrary to the above, on April 30 and May 20, 1990, individuals were exposed to radioactive materials such that significant quantities were measured in their lungs and an accurate assessment of their intake was not made until August 2, 1990.
>
> 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 is less than adequate procedures in that Radiological Programs Instructions (RPIs) do not require bioassay calculations to be in the form of MPC-Hours. The RPIs provide results of Whole Body Counts in terms of Curies and Percent Maximum Permissible Body Burden (MPBB).

Contributing factors include 1) the RPIs currently do not require independent review of calculations associated with bioassay results, and 2) neither Plant Procedures (PPMs) nor the RPIs provide for timely entry of Whole Body Counter-derived MPC-Hours into the Radiation Exposure Reporting (RER) System.

Corrective Steps Taken/Results Achieved

1. The corrected MPC-Hour exposure data for the individuals involved in the two incidents has been entered into the RER System.

2. As an interim corrective action until formal programmatic changes are implemented, Radiological Programs personnel involved in calculations of internal depositions have been directed to perform MPC-Hour calculations and provide the results to the Plant Health Physics staff.

Corrective Action to be Taken

1. Applicable Radiological Program Instructions will be revised to require prompt calculation and reporting of MPC-Hours associated with all positive Whole Body Counts where the time of exposure is known.

2. Applicable Radiological Program Instructions will be revised to require the timely review, by a second individual, of bioassay calculations. Necessary calculations will also be incorporated into a standard form using consistent units.

3. Plant Procedure (PPM) 11.2.4.1, " MPC-HOUR Assessment and Documentation," will be revised to provide for input of "best available" MPC-Hour data.

Date of Full Compliance

Although full compliance was achieved when the correct MPC-Hour exposure data was entered into the RER System, all further corrective actions will be completed by October 31, 1990.

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