



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

October 18, 1991  
G02-91-192

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 91-26  
RESPONSE TO NOTICE OF VIOLATION

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The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 20, 1991. 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

REF/bk  
Attachments

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

~~911023-0032~~

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## APPENDIX A

During an NRC inspection conducted August 5 - 9, 1991, one 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 (1991), the violation is listed below:

- A. 10 CFR 20.203(f) requires that, except as provided by 10 CFR 20.203(f)(3), each container of specified amounts of licensed material bear a durable, clearly visible label identifying the radioactive contents.

Contrary to the above, on August 7, 1991, three containers of assorted radioactive material containing approximately 72.65 mCi of mixed radionuclides did not bear any label identifying the radioactive contents and the containers were not excepted from such labeling.

This is a Severity Level IV violation (Supplement IV)

### Validity of Violation

The Supply System acknowledges the validity of this violation. The root cause for the violation is that Training was Less Than Adequate because the training to radwaste workers of radioactive container labeling requirements was incomplete.

The radioactive shipping containers found on August 7, 1991, without the required labelling were filled with filter-demineralizer (F/D) septums on August 5, 1991, and had been closed the same day. In an effort to create more storage area, the containers were closed and stacked by the radwaste workers without HP personnel being present at the time, and without the outer container labels being attached. However, there were process controls in place at the time of the incident that would have ensured that the containers would have been properly labelled prior to their movement across a material control zone boundary.

Normally low level radioactive material is brought to the radioactive material storage area where it is later compacted, placed in shipping containers and moved to a storage area outside of the Radwaste Building. HP personnel are present prior to closure of the containers to attach the necessary labeling. However, in this particular case, the F/D septums were not compacted and the containers were being intentionally stored in the radioactive material storage area. This was a change from the process to which radwaste workers are normally accustomed. Had compacting been specified, the radwaste workers would have notified Health Physics personnel to label the containers at the appropriate step in the process.

It was determined that the training for the radwaste workers did not provide adequate instruction on the labeling requirements for containers containing radioactive material.

### Corrective Steps Taken/Results Achieved

1. The containers were labeled as required.
2. The individuals involved were counseled and the labeling requirements discussed.



Corrective Action to be Taken .

Training instruction to the radwaste workers will be improved to ensure they are aware of container labeling requirements.

Date of Full Compliance

The Supply System was in full compliance on August 7, 1991, when the above described radioactive shipping containers were properly labeled.



# FORD 1

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 BOUCHEY, G.C.    Washington Public Power Supply System  
 RECIP. NAME    RECIPIENT AFFILIATION  
                  Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC 910920 ltr re violations noted in  
 insp rept 50-397/91-26. Corrective actions: containers labeled  
 as required & individuals involved were counseled & labeling  
 requirements discussed.

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NRC Site Inspector - 901A

270-71 9110230032 911018  
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