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January 24, 1992  
602-92-020

COPY

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 91-36  
RESPONSE TO NOTICE OF VIOLATIONS

The Washington Public Power Supply System hereby replies to the Notice of Violations contained in your letter dated December 17, 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). Per discussions between GC Sorensen of the Supply System and G. Yuhas of your staff, the response time was extended to January 25, 1992 because your letter was not received at the Supply System until December 26, 1991. We appreciate this consideration.

In Appendix A, the violations are addressed with an explanation of our position regarding validity, corrective action and date of full compliance.

Very truly yours,

L. L. Grumme, Acting 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

9202050128  
5 pp.

## Appendix A

During an NRC inspection conducted on October 7-11 and 29, 1991, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. 10 CFR 20.201 (b) requires that each licensee make such surveys as may be necessary to comply with the requirements of Part 20 and which are reasonable under the circumstances to evaluate the extent of the radiation hazard that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, on October 9, 1991, the licensee did not make surveys which were reasonable under the circumstances to evaluate the extent of the radiation hazard associated with the radioactive material transfer for the disposal of Box No. 129049 in that a small area emanating 140 mR/hr was not detected. The licensee measured and recorded on the shipping papers/waste manifest a box maximum contact dose rate of 30 mR/hr.

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 was that Management Programs were Less Than Adequate in establishing adequate work practices. Performance by the Health Physics technician did not ensure that all areas of the shipping container were properly surveyed. This incident indicated that the techniques and equipment used to locate the highest reading area of radiation on the radioactive waste shipment needed to be improved to prevent discrepancy between the manifest and the receipt surveys. A contributing cause for the violation was that Procedures were Less Than Adequate because equipment requirements were not sufficiently specified to ensure optimum equipment would be used for surveillance activities. In this event, use of a faster responding survey meter, such as a Geiger-Mueller (GM) tube type, would have resulted in detection of the small high dose rate areas.

### Corrective Steps Taken/Results Achieved

- 1) New GM tube type survey equipment has been purchased and appropriate Plant Radiation Protection procedures have been revised to specify the new surveillance equipment. This facilitates more accurate identification of highest dose rate areas on radwaste shipping containers.
- 2) Enhanced survey technique training has been developed to upgrade Health Physics technicians skills in performing shipment surveys. This will help ensure the highest contact dose rates on shipping containers are identified and recorded.



- 3) Selected Health Physics technicians have been trained and qualified to the enhanced survey techniques for radwaste shipment surveys. Only individuals skilled in the enhanced techniques perform shipment surveys.

Corrective Action to be Taken

Based upon the Root Cause Analysis for this event, no further corrective actions have been identified to prevent recurrence.

Date of Full Compliance

WNP-2 was in full compliance by November 8, 1991, upon completion of training and qualification of selected HP technicians for radwaste shipment surveys.

- B. Technical Specification (TS) 6.8.1 states in part that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 1 of Appendix A requires that administrative procedures be established to control plant procedures.

"Use of Controlled Plant Procedures," Procedure 1.2.3, Section 5.5, "Procedure Adherence," states in part that:

Any person performing a task for which there is a procedure is responsible for doing the job as described by that procedure. When a procedure is unable to be performed as approved and the revision process is not appropriate, a procedure deviation shall be initiated.

Contrary to the above, on at least 8 occasions between February 6, 1991 and October 9, 1991, the person performing Sections 8.7.10 and 8.7.11 of "High Voltage Plateau for Kaman Beta Scintillators," Procedure 12.13.26, was unable to perform the procedure as approved, and the person did not initiate a deviation request.

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



### Validity of Violation

The Supply System acknowledges the validity of this violation. The procedure was incorrect and should have been changed. The root cause for the violation was that the Procedure had Inadvertent Technical Inaccuracies Not Apparent to the User. The acronym for "Upper Limit High Voltage" of ULHV was incorrectly used twice in the procedure in consecutive steps instead of the correct acronym of LLHV for "Lower Limit High Voltage". Also, procedural guidance initially specified the high voltage operating point to be 25 to 35 volts above the LLHV. Experience with the operating plateau of the instrument has indicated that the operating point could be set 50 volts above the LLHV and continue to provide stable operation. The procedure was also changed to specify a new high voltage range.

Inadvertent technical inaccuracies were introduced in the last revision, i.e., Revision 4. Revision 3 had the correct acronyms. Intended Revision 4 changes were minor and unrelated to the portion of the procedure where the inadvertent acronym changes had occurred. Change bars were provided in the right hand margin to signify the intended changes. Standard review of the procedure changes during the approval process and subsequent review by Health Physics personnel (via the required reading process) did not discern the error, which had not been highlighted as a change. Hence the error remained undetected and unchanged prior to and following incorporation of Revision 4 into the Plant Procedures Manual (PPM).

The calibration procedure revision received the reviews and approvals required by the Plant procedures in effect at the time. The procedure had been reviewed for accuracy by the individual who prepared the revision. An independent review was also performed on the requested changes to the procedure. The post-revision review failed to identify these errors.

It is recognized that the errors remained undetected for approximately one year. Plant policy requires the individual to perform the task as described in the appropriate procedure. Most often, this entails having the procedure present at the work site. However, Plant policy (PPM 1.2.3) does allow repetitive, frequently performed tasks to be executed without the procedure being physically present. This exception recognizes that there are some tasks which are performed frequently enough that an individual may become sufficiently skilled and familiar with the procedure to perform the task correctly without directly referencing the procedure.



The individual who prepared Revision 4 was the principal individual in all eight subsequent performances of the procedure. The individual is a highly experienced Health Physicist and had been performing this and similar duties since initial Plant startup. In this instance, the technician performed the instrument calibration correctly on numerous occasions. This fact attests to the individual's knowledge of the technical requirements for correct calibration of the instrument. Had less experienced or less knowledgeable personnel been assigned to perform the calibration, Plant policy and management expectations require the procedure to be physically present. This would have resulted in identification of the errors by the qualified personnel and cessation of the task until the procedure was corrected. Execution of the as-written procedure would have resulted in failure to meet the acceptance criteria, prompting immediate corrective actions to deviate the procedure and return the equipment to an operable status.

Corrective Steps Taken/Results Achieved

- 1) Plant Procedure PPM 12.13.26 (High Voltage Plateau for Kaman Beta Scintillators) was deviated immediately to correct the errors and clarify other technical issues identified.
- 2) The calibration data for the particular instrument involved in this event and all other instruments that had been calibrated under this procedure were immediately reviewed to verify operability.
- 3) The individual involved was counseled on the individual responsibility of following procedures accurately and of the importance of immediately correcting procedural inaccuracies.
- 4) Management expectations on procedural compliance were reiterated via a memo to HP/Chemistry personnel.

Corrective Action to be Taken

No further corrective actions were identified.

Date of Full Compliance

WNP-2 was in full compliance October 10, 1991 when the procedure was deviated to correct the editorial errors.





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 GRUMME, L.L.      Washington Public Power Supply System  
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                          Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 911217 ltr re violations noted in Insp Rept  
 50-397/91-36 on 911007-11 & 29. Corrective actions: new  
 Geiger-Mueller tube type survey equipment purchased & plant  
 radiation protection procedures revised.

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