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SUBJECT: Suppls response to NRC 911016 ltr re violations noted in
 Insp Rept 50-397/91-31 re 910417 personnel overexposure.
 Corrective actions: plant supervisor added to health physics
 dept to increase field oversight.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 7, 1992
G02-92-035

Docket No. 50-397

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

Subject: WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 91-31
SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION

Reference: Letter, RA Scarano (NRC) to GC Sorensen (SS), "Notice of Violation and Inspection Report No. 50-397/91-31", dated October 16, 1991

The Washington Public Power Supply System provides this letter as a supplement to our previous reply regarding Notice of Violations contained in the reference. During discussions with Region V NRC staff, it was mutually agreed that our initial response did not provide a thorough discussion on the topic of radiological survey adequacy. This letter provides supplemental information related to radiological surveys and concludes that the Supply System is programmatically sound in this area.

Immediately following the personnel overexposure event on April 17, 1991, all resin spill cleanup work was stopped pending approval to proceed from the Plant Manager. An investigation was initiated by the Health Physics (HP) Department. Preliminary causes for the event were identified on April 25, 1991. One such cause indicated the survey was inadequate. As a result, direction was given to HP Department personnel that the results of a pre-job radiological survey would be required to be available prior to the start of every job in a radiologically posted area or continuous coverage would be required until the conditions were known. The need for all personnel involved to attend the pre-job briefings has been re-emphasized to ensure existing conditions at the job site are adequately communicated. Prior to restart of the resin spill cleanup activities, job site radiological survey data were obtained and communicated in subsequent pre-job briefings.

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A review was performed to identify possible programmatic weaknesses in the area of radiological surveys. The Plant procedure regarding Area Radiation and Contamination Surveys (PPM 11.2.13.1, Rev. 5) did provide an adequate description of the purpose of surveys and items to be considered prior to entry into a radiation zone or contaminated area. Review of the corresponding HP technician training on the procedure was determined to be adequate. The technicians are trained to permit no one to enter an area in which the dose rates are not known. They are further trained that failure to adhere to this policy is a 10 CFR 20 violation. In addition, the HP Technician Continuing Training was revised to include specific review of the April 17, 1991 overexposure event with focus on the survey issue.

Management individually interviewed several HP Journeyman and in-grade technicians to assess the general knowledge of technicians with respect to surveys. The results indicated that the technicians knew the survey requirements and understood management expectations relative to individual performance.

Health Physics Department management held discussions with the HP technicians to describe the Notice of Violations received in Inspection Report No. 50-397/91-31. The significance of performing adequate surveys was emphasized.

A Plant Supervisor has been added to the Health Physics Department with expectations to increase oversight in the field and to periodically evaluate on-the-job performance, including radiological surveys. Guidance is provided to the technicians when weaknesses are observed. The expected increased oversight is also intended to provide more timely feedback on general technician performance relative to programmatic requirements.

The formal root cause analysis determined that the primary root cause was personnel performance. Review of Plant procedures and HP technician training in the area of radiological surveys has been found to be programmatically sound. Lessons learned from this event are being incorporated into the HP technician training modules to minimize the probability of this event recurring. All radiologically related 1991 outage work and work since the outage was completed without a similar event. However, we will remain alert to performance trends in our program, and institute corrections as needed. The need to perform adequate radiological surveys continues to be emphasized and improvements to survey techniques encouraged to further ensure the safety of Plant personnel working in radiological areas.

Sincerely,


L. L. Grumme, Acting Director
Licensing & Assurance (Mail Drop 280)

REF/bk

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