



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

October 19, 1992
G02-92-242

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 92-28
RESPONSE TO NOTICE OF VIOLATION

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated September 18, 1992. 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.

Sincerely,


D. V. Parrish, Operations
Asst. Managing Director (Mail Drop 1023)

CLF/bk
Attachments

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

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APPENDIX A

During an NRC inspection conducted on July 13 through August 23, 1991 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:

10 CFR 20.203(b), "Radiation Areas," states, in part, "Each radiation area shall be posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION RADIATION AREA."

Technical Specification 6.8.1, states in part, "Written procedures shall be established, implemented and maintained covering...k. Health Physics/Chemistry Support."

WPPSS Health Physics Program Description (HPPD), Revision 33, Section 3.1.7.4.1 states, in part, "An area shall be posted as a radiation area where there exists radiation at such levels that a major portion of the body could receive in any one hour a dose of 2.5 millirem....The posting of such an area shall include the words 'CAUTION, RADIATION AREA.'"

Contrary to the above, on July 31, 1992, at 5:30 p.m., the northwest valve room on the 471-foot level of the reactor building contained radiation levels greater than 2.5 millirem per hour, but was not posted as a radiation area.

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

Validity of Violation

The Supply System acknowledges the validity of this violation. The root cause of this event was personnel performance. Notification was not made to the health physics department that the radiation barrier needed to be replaced. A contributing cause was determined to be managerial methods. Further evaluation (see below) shows the station policy on radiation posting has not been adequately enforced.

During a plant tour on July 31, 1992 an NRC inspector noted that the northwest valve room on the 471 foot level of the Reactor Building was not posted as a radiation area. The radiation area sign was obscured from sight hanging from a single pad and hookeye on one side of the entrance to the valve room.



Corrective Steps Taken/Results Achieved

The Plant Technical Manager was touring the Reactor Building at the same time and was informed of the missing radiation barrier by the NRC Inspector. The Plant Technical Manager notified Health Physics and guarded the area as a compensatory measure until the HP technician arrived. The HP technician surveyed the area to confirm that a radiation area still existed. The survey indicated various radiation levels up to 10 millirem per hour. Action was taken to immediately repost the area. This was done by replacing the pad and hookeye on the side of the valve room entrance where it had been removed and rehanging the posting.

An Incident Review Board (IRB) was immediately convened on July 31, 1992. The IRB interviewed the workers and management associated with the event. The IRB found that the mechanics had removed the posting to support the taking of measurements for a metal gate which would eventually be installed at the entrance to the northwest valve room. The pad and hookeye supporting one side of the posting was removed from the wall to scribe a line showing the future location of the gate. The measurements took place during the afternoon of July 31, 1992 and the mechanics had left the area prior to discovery by the NRC inspector. The requirement to contact HP in this situation was known to the mechanics involved.

The Mechanical Maintenance personnel involved were counseled on the importance of maintaining radiation barrier postings at all times.

Further Evaluation

Further evaluation was performed on the general topic of posting of radiation area boundaries. A review of recent Inspection Reports on this subject shows a violation has been received in each of the last five years. A review of the corrective actions taken in response to these violations was performed in an attempt to determine why they were not effective in preventing recurrence of the issue. The corrective actions taken previously included:

1. Counseling of the individuals involved;
2. An evaluation of the methods used for posting;
3. Using additional levels of oversight to monitor posting compliance;
4. Discussion of Radiation Protection (including posting) requirements during meetings with all impacted personnel; and
5. Issuance of a memo from the Plant Manager on the importance of avoiding Radiation Protection violations.

It was concluded that management actions to implement these corrective actions over the long term have not been effective. Individual specific actions have been taken over the years but there does not appear to be an effective continuous program to assure success.

Corrective Action to be Taken

1. This event will be reviewed by Plant Maintenance, Operations, Health Physics, and Plant Technical Managers and discussed with their employees. The discussion will cover the improper actions, the correct actions the employees should have taken, the use of self checking, and management's expectations of employees. This action will be completed by November 15, 1992.
2. Management will reinforce its position on Radiation Protection to all personnel. This will be done initially prior to December 1, 1992 and periodically thereafter. This position will include:
 - a. Expectations with respect to individual responsibilities for radiation posting.
 - b. A review of plant trends involving personally preventable radiation protection occurrences.
 - c. Use of standard techniques such as self checking to prevent recurrence.
3. Interactive management techniques will be used to resolve radiological infractions resulting from unsatisfactory personnel performance. These techniques utilize graduated corrective actions ranging from individual counseling to disciplinary action, depending on the nature and frequency of the infraction.
4. Management is currently revising its posture on personnel performance issues. This was initiated as part of its "procedural compliance" initiative but also is applicable here. The critical element of this revision is that the employee and supervisor is accountable for performance. This topic was discussed with Region V Management at the NRC/Supply System meeting on October 15, 1992.

Date of Full Compliance

WNP-2 was in full compliance when the posting was restored to the correct position.

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 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

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 counseled on importance of maintaining radiation barrier
 postings at all times.

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