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ACCESSION NBR: 9407200102 DOC. DATE: 94/07/14 NOTARIZED: NO DOCKET # 05000397
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power
 AUTH. NAME: PARRISH, J.V. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940614 ltr re violations noted in insp rept 50-397/94-17. Coorctive action: initiated immediate HP time out for night shift personnel to assure awareness.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 14, 1994
GO2-94-162

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 94-17
RESPONSE TO NOTICE OF VIOLATION**

Reference: Letter, dated June 14, 1994, Samuel J. Collins (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/94-17 (Notice of Violation)"

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated June 14, 1994. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

Should you have any questions or desire additional information regarding this matter, please call me or D. A. Swank at (509) 377-4563.

Sincerely,

J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

CDM/bk
Attachments

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

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Appendix A

VIOLATION

During an NRC inspection conducted on May 16 - 20, 1994, 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:

- A. Technical Specifications Section 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Section 7.e, recommends radiation protection procedures for. . . . (1) Access Control to Radiation Areas Including a Radiation Work Permit System,. . . .

- Procedure PPM 1.11.11, "Entry Into, Conduct In, and Exit From Radiologically Controlled Areas," Sections 4.1.2 and 4.1.3 authorizes personnel to transit directly from the primary access point, alternate access point, or the main control room to a remote health physics control point (i.e., Drywell, 606-foot Rx, Turbine Building 501-foot level) and return without the use of a radiation work permit.

Contrary to the above, on May 16, 1994, the inspectors identified two individuals who did not transit directly via an authorized designated route to the health physics control point located on the 501-foot level of the turbine building.

- Procedure PPM 1.11.11, Section 6.1.1, requires workers entering a radiological controlled area to read the applicable radiation work permit and review the radiological conditions for the area or the job. Procedure 1.11.22, "Use of the Total Exposure System for Access Control," Section 7.1, states, in part, that it is the responsibility of the individual to ensure applicable radiation work permits and ALARA tasks are read prior to entry into a radiological controlled area. Section 7.1.6.5 requires, in part, that individuals entering a radiological controlled area ensure that the correct revision to the radiation work permit and ALARA task requirements have been read.

Contrary to the above, on May 19, 1994, workers were observed entering a radiological controlled area from the primary access control point without having read the applicable radiation work permit and ALARA task before gaining access to the area. One worker, in particular, gained access to the radiological controlled area by logging in on ALARA Task No. DL56 01 which listed the current radiation work permit number as 94000196 00. It was subsequently determined that the radiation work permit had been revised to No. 94000196 01, and the individual had not read the revised radiation work permit prior to entry.

This is a Severity Level IV Violation (Supplement IV) (50-397/9417-01).



RESPONSE TO VIOLATION

The Supply System accepts this violation.

REASON FOR THE VIOLATION

The root cause for the first (May 16, 1994) example of the violation was a misunderstanding between Health Physics (HP) personnel and two craft workers. HP management modified the Radiologically Controlled Area (RCA) access requirements for the Spring 1994 Maintenance and Refueling (R-9) Outage. Certain transit paths through the RCA were designated that did not require an ALARA Work Task. An ALARA Work Task is the equivalent of a Radiation Work Permit (RWP) at most nuclear power plants. In the case of the violation identified by the NRC inspectors, the normal designated transit path to the Turbine Building 501-foot level remote control point had to be altered due to the Radwaste Building elevator being temporarily out of service. Because of a misunderstanding between HP personnel and the two workers regarding the alternate path, the workers did not correctly follow HP Procedure PPM 1.11.1, "Entry Into, Conduct In, and Exit From Radiologically Controlled Areas."

The root cause for the second (May 19, 1994) example of the violation was an HP department administrative oversight. The HP department did not distribute Work Order (WO) Task-specific ALARA Work Tasks to the RCA Primary Access Point (PAP) and Alternate Access Point (AAP) control points. As a consequence, workers could not review WO Task-specific ALARA Work Tasks at the PAP and AAP control points prior to each RCA entry. This resulted in workers not correctly following PPM 1.11.1 and PPM 1.11.22, "Use of the Total Exposure System (TES) for Access Control."

CORRECTIVE STEPS TAKEN/RESULTS ACHIEVED

1. The Outage Manager initiated an immediate HP "Time Out" for night shift personnel to assure awareness of HP management expectations regarding transit paths to remote HP control points. This issue was also discussed with plant management and supervision at the following Plan of the Day (POD) Meeting.
2. Following the above action, HP outage access control clerks at the PAP and AAP were directed to question workers entering the RCA to ensure adequate knowledge of allowable transit routes.
3. Copies of the latest revisions of active WO Task-specific ALARA Work Tasks were made available at appropriate HP control points to allow review prior to RCA entry.
4. HP supervision directed HP personnel to ensure that workers read and are knowledgeable of current WO Task-specific ALARA Work Task requirements prior to each RCA entry.

CORRECTIVE STEPS TO BE TAKEN

It was determined that no additional corrective steps were necessary to ensure compliance.

DATE OF FULL COMPLIANCE

Full compliance was achieved on May 18, 1994 when the corrective steps taken were completed.