

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9804020180 DOC. DATE: 98/03/23 NOTARIZED: NO DOCKET #
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 AUTH. NAME AUTHOR AFFILIATION
 BEMIS, P.R. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 980219 ltr re violations noted in insp rept
 50-397/97-20. Corrective actions: three sealed bags containing
 high efficiency particulate air filters were properly
 labeled as radioactive material immediately after discovery.

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 TITLE: General (50 Dkt) - Insp Rept/Notice of Violation Response

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

March 23, 1998
GO2-98-058

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

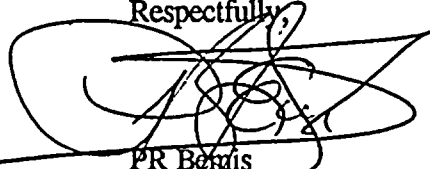
Subject: WNP-2, OPERATING LICENSE NPF-21,
NRC INSPECTION REPORT 97-20, RESPONSE
TO NOTICE OF VIOLATION

Reference: Letter dated February 19, 1998, TP Gwynn (NRC) to JV Parrish (SS), "NRC
Inspection Report 50-397/97-20 and Notice of Violation, and Exercise of
Enforcement Discretion"

The Supply System's response to the referenced Notice of Violation, pursuant to the provisions of
Section 2.201, Title 10, Code of Federal Regulations, is enclosed as Attachment A.

Should you have any questions or desire additional information regarding this matter, please call
Mr. PJ Inserra at (509) 377-4147.

Respectfully,


PR Benis
Vice-President, Nuclear Operations
Mail Drop PE23

Attachment

cc: EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
C Poslusny, Jr. - NRR

NRC Sr. Resident Inspector - 927N
DL Williams - BPA/399
PD Robinson - Winston & Strawn

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NRC INSPECTION REPORT 97-20, RESPONSE TO NOTICE OF VIOLATION

Attachment A
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VIOLATION A

Restatement of Violation

- A. 10 CFR 20.1904(a) requires the licensee to ensure that each container of licensed material bears a durable, clearly visible label bearing the words "CAUTION, RADIOACTIVE MATERIAL," or "DANGER, RADIOACTIVE MATERIAL." The label must also provide sufficient information (such as the radionuclide(s) present, an estimate of the quantity of radioactivity, the date for which the activity is estimated, etc.) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures.

Contrary to the above, on December 31, 1997, three sealed bags containing high efficiency particulate air filters with internal contamination did not bear labels that identified the radionuclide(s) or the quantity of radioactivity, nor did they otherwise bear sufficient information to permit individuals handling or using the bags, or working in the vicinity of the bags, to take precautions to avoid or minimize exposure.

This is a Severity Level IV violation (Supplement IV) (VIO 50-397/97020-08).

Response to Violation A

The Supply System accepts the violation.

Reason for Violation A

The Supply System agrees with the characterization of the violation given in the Notice of Violation and associated Report Details.

The root cause for failure to label the three bags containing radioactive materials was determined by analysis to be a failure to adequately implement the plant policy for labeling of radioactive material. A contributing cause was determined to be incomplete follow-through on identified corrective actions for previous failures to ensure proper labeling of radioactive materials.

Corrective Actions Taken and Results Achieved

The three sealed bags containing high efficiency particulate air filters were properly labeled as radioactive material immediately after discovery on December 31, 1997.

Radiation Protection supervision has been appraised of Management's expectation to evaluate the potential effect on problem recurrence prior to approving extensions of corrective action due dates. Multiple extensions of due dates will also require a higher level of management review.

NRC INSPECTION REPORT 97-20, RESPONSE TO NOTICE OF VIOLATION

Attachment A

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Corrective Steps That Will Be Taken to Avoid Further Violations

Training program enhancements will be developed and implemented by January 15, 1999 for all radiation workers to address the radioactive material labeling policy.

An inspection will be completed by March 31, 1998 to ensure radioactive material containers in the power block are appropriately labeled.

Date of Full Compliance

Full compliance was achieved when the three sealed bags containing high efficiency particulate air filters were properly labeled as radioactive material immediately after discovery on December 31, 1997.