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SUBJECT: Responds to NRC 980618 ltr re violations noted in insp rept 50-397/98-10. Corrective actions: individual has been designated w/responsibility for assuring SSAC meeting minutes are maintained per procedure.

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July 15, 1998
GO2-98-124

Docket No. 50-397

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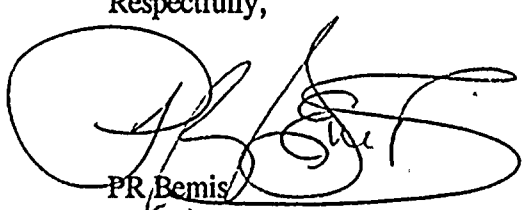
Subject: WNP-2 OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 98-10, RESPONSE TO NOTICE OF
VIOLATION

Reference: Letter dated June 18, 1998, B Murray (NRC) to JV Parrish (SS), "NRC Inspection
Report 50-397/98-10"

The Supply System's response to the 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 Bemis
Vice President, Nuclear Operations
Mail Drop PE23

Attachment

cc: EW Merschoff - NRC RIV
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INSPECTION REPORT 50-397/98-10 RESPONSE TO NOTICE OF VIOLATION

Appendix A
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Restatement of Violation

Technical Specification 5.4.1.a. states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Regulatory Guide 1.33, Appendix A, Section 7.e.9, requires procedures for the implementation of the ALARA program.

- . Section 2.3 of Procedure GEN-RPP-13, "ALARA Committee," Revision 1, states, in part, that the senior site ALARA committee is responsible for the review of outage exposure goals.
- . Section 5.1.4 of Procedure GEN-RPP-14, "Control of Temporary Shielding," Revision 1, states, in part, that the ALARA shielding coordinator is responsible for ensuring that ALARA reviews are performed to determine shielding requirements and evaluating the exposure reduction effectiveness (of the shielding).

Contrary to the above,

- . On June 3, 1998, the inspector determined that the exposure goal for Refueling Outage 13 was not reviewed by the senior site ALARA committee prior to the outage.
- . On June 4, 1998, the inspector identified that ALARA reviews and exposure reduction effectiveness evaluations were not performed to determine shielding requirements and the exposure reduction effectiveness (of the shielding).

This is a Severity Level IV violation (Supplement IV)(50-397/9810-01).

Response to Violation

The Supply System accepts the violation and agrees with the staff's characterization of the two examples for the violation given in the Report Details section of Inspection Report 50-397/98-10.

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Reason for Violation (example one)

The root cause was determined to be management methods - effectiveness of methods/assignments not adequately tracked. The Senior Site ALARA Committee (SSAC) meeting minutes were not well documented. Although committee members remember discussing 1998 refueling outage exposure goals, discussions and actions taken were not captured in enough detail to allow for subsequent review or verification. Issues with inadequate meeting minutes were identified in two previous Problem Evaluation Requests. In both cases, the SSAC chairman failed to ensure that procedural requirements for meeting minutes were adhered to. Contributing to the problem, when SSAC membership changed the responsibility for documenting meeting minutes was not reassigned to a new member.

Corrective Actions Taken and Results Achieved (example one)

An individual has been designated with the responsibility for assuring SSAC meeting minutes are maintained per procedure.

Corrective Steps to be Taken to Avoid Further Violations (example one)

A Plant Tracking Log item has been initiated directing the SSAC to review the 1999 refueling outage dose goal by September 30, 1998 and to ensure committee discussions, results, and actions are documented in meeting minutes.

An independent assessment of the functions of the SSAC will be performed in August 1998 and resulting recommendations for improvement will be implemented.

Date of Full Compliance (example one)

Full compliance was achieved on July 13, 1998 when an individual was assigned the responsibility to assure SSAC meeting minutes are maintained per procedure.

Reason for Violation (example two)

The root cause was determined to be management methods - effectiveness of methods/assignments not adequately tracked. ALARA planners used pre and post job Health Physics surveys to determine the need for, and effectiveness of, temporary shielding. These reviews were not documented nor were the reviews included in the temporary shielding packages.

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Appendix A

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In addition, results of the effectiveness of shielding efforts were not evaluated by the ALARA Coordinator to determine the overall exposure reduction. Contributing to the problem, some procedural requirements are listed in the responsibility section of the procedure and not repeated in the implementation section. This led to uncertainty by some users as to the need to perform actions not specified in the implementation portion of the procedure.

Corrective Actions Taken and Results Achieved (example two)

Management expectation that temporary shielding evaluations and temporary shielding effectiveness evaluations be performed for all shielding installations was reviewed with Health Physics exempt staff. The need to include documentation of the reviews and evaluations in the temporary shielding packages was also discussed.

Corrective Steps to be Taken to Avoid Further Violations (example two)

Plant Procedure GEN-RPP-14 "Control of Temporary Shielding" will be revised to clarify the requirement that ALARA reviews and temporary shielding exposure reduction effectiveness evaluations be performed. In addition, the revision will include the requirement to include a copy of the ALARA reviews in the temporary shielding packages. The procedure revision will be completed by September 10, 1998.

Date of Full Compliance (example two)

Full compliance was achieved July 8, 1998 when management expectations for shielding reviews and documentation were discussed with the Health Physics staff.