

CATEGORY 1

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SUBJECT: Responds to NRC 981108 ltr re violations noted in insp rept
 50-397/98-18.Corrective actions:will conduct remedial
 training for HP technicians & supervisors on procedural
 requirements & will procure battery powered samples for OSC.

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November 11, 1998

Docket No. 50-397

U.S. Nuclear Regulatory Commission
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Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 50-397/98-18
RESPONSE TO EXERCISE WEAKNESS**

Reference: Letter, dated October 8, 1998, Blaine Murray (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/98-18"

The Supply System hereby replies to the exercise weakness identified in your letter dated October 8, 1998. Our reply, pursuant to the provisions of 10 CFR 50, Appendix E.IV.F, provides a description of corrective measures and the schedule for completion of those actions.

Section P4.4, "Operations Support Center," of the referenced inspection report included an identified weakness for failure to properly monitor habitability in the Operations Support Center (OSC). The specific weakness consisted of six examples where the habitability process was not effectively implemented in the OSC. 1/0

The Supply System concurs with the assessment that the habitability monitoring of the OSC was inadequate to prevent or limit facility contamination and minimize personnel exposures and recognizes that improvements should be made in this area. Corrective measures consist of: 1) remedial training for Health Physics (HP) Technicians and Supervisors on the procedural requirements and necessary activities described in PPM 13.10.10, Health Physics, Chemistry, Operations Support Center Duties, Revision 12 for maintaining OSC habitability; 2) procurement of battery powered air samplers for OSC use; and 3) development of a survey map for OSC habitability use. The scheduled completion date for corrective actions is February 26, 1999. Teo1

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The following supplemental information pertaining to the six examples which make up the weakness is also provided for clarification purposes. For ease of reference, a summary statement for each example is provided.

Example 1

"Habitability surveys (airborne, contamination, and area surveys) were either never performed or were not regularly performed in all areas occupied by OSC personnel. Maps were not used to identify areas surveyed, and different health physics technicians surveyed different areas. Survey documentation was unclear since only one dose reading was recorded for all the areas surveyed."

Response

We agree that habitability surveys were not performed to our expectations. Occupied areas should be resurveyed when conditions change or are expected to change significantly. Area surveys should be sufficient to provide information which accurately portrays the radiological conditions present in areas occupied by personnel with results recorded on an appropriate survey map and record form. Corrective action will include addressing this specific item during remedial training for HP Technicians and Supervisors on PPM 13.10.10, and the development of a survey and barrier map for OSC habitability use.

Example 2

"The continuous air monitor and portable area radiation monitor were not positioned to provide a representative sample of habitability conditions in the center. Moreover, there were multiple ventilation zones and multiple paths for air to circulate into the center and bypass the monitors."

Response

The procedural steps are written to allow the HP Lead to locate the Continuous Air Monitor (CAM)/Area Radiation Monitor (ARM) in what he considers to be the most appropriate location. In this case the CAM and ARM were located in the hallway outside the entrance to the OSC. Due to the fact General Service Building (GSB) access was not restricted and a window was open inside the OSC, multiple pathways and airflow patterns existed. This complicated the locating of the air monitors to achieve a representative measurement. Remedial training for HP Technicians and Supervisors will stress the importance of locating air sampling equipment in locations where representative samples of the breathing area air under working conditions can be obtained.

Example 3

"An alternative means of air sampling was not established following the loss of power and the corresponding loss of the continuous air and portable area radiation monitors. There were no battery powered air samplers available for use within the plant."

Response

We agree that OSC personnel did not pursue the need to locate alternative sources of power or to obtain battery powered air samplers. The need to procure and stage portable generators for OSC use during loss of power conditions is being evaluated. The evaluation will determine generator size, number of portable generators needed and minimum requirements for battery power to the OSC. A minimum of three battery powered air samplers for OSC use during loss of power conditions will be purchased.

Example 4

"Potential contamination paths were not properly evaluated and controlled. For example: (1) contamination control boundaries were not established to define the areas to be monitored; (2) an exterior window in the OSC command area remained open until 1:22 p.m., about 2.5 hours after the start of the release; (3) exterior doors into the area near the conference room (the area occupied by craft personnel) was not controlled; and (4) contamination surveys were not performed in occupied areas after the window was discovered open and the continuous air monitor alarmed."

Response

We agree that potential contamination paths were not properly evaluated and controlled. Following activation of the OSC, OSC personnel are staged in the GSB lunchroom, access control area, and the work control conference room. Procedure 13.10.10 requires the performance of routine radiation and contamination surveys of the OSC and GSB work areas not monitored by the CAM, ARM and IPM-8s. This issue will be addressed in remedial training for HP Technicians and Supervisors.

Example 5

"When plant conditions worsened and a radiological release was anticipated, access to the general services building was not restricted to a single entry point, and a step off pad and frisker were not staged at this entry point as required by Procedure 13.10.10, Health Physics, Chemistry, Operations Support Center Duties, Revision 12."

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Response

We agree that following activation of the OSC, as radiological conditions worsened, access to the GSB should have been restricted per the procedure to specific access points with a step off pad and frisker available at these locations. Remedial training for HP Technicians and Supervisors will stress the importance of proper OSC access control, minimizing contamination of OSC work areas, and the need to follow procedural guidance.

Example 6

"Hourly habitability surveys were performed instead of every 30 minutes, as specified in Procedure 13.10.10, Health Physics, Chemistry, Operations Support Center Duties, Revision 12."

Response

We agree that habitability surveys were not performed at the frequency identified in Procedure 13.10.10. It is our expectation that procedures will be complied with. Remedial training for HP Technicians and Supervisors will stress the importance of 30 minute surveys for trending radiological conditions and for specific personnel exposure prediction.

Should you have any questions or require additional information pertaining to this letter, please contact Mr. Tim Messersmith at (509) 377-8568.

Respectfully,



RL Webring
Vice President, Operations Support/PIO
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