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McGuire Nuclear Station
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DUKE POWER

May 5, 1994

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
NRC Inspection Report No. 50-369, 370/94-06
Violation 50-369, 370/94-06-01
Reply to a Notice of Violation

Gentlemen:

Enclosed is the response to the Notice of Violation issued April 8, 1994 concerning failure to survey material leaving the Radiation Controlled Area.

Should there be any questions concerning this response, contact Randy Cross at (704) 875-4179.

Very Truly Yours,

T. C. McMeekin

Attachment

xc: (w/attachment)

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McGuire Nuclear Station
Reply to a Notice of Violation

Violation 369, 370/94-06-01

Technical Specification 6.8.1, requires that written procedures be established, implemented, and maintained covering the activities in the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, 1978.

McGuire Radiation Protection Manual Section 1.4.1, requires that all work with radioactive materials or radiation be performed under an appropriate, approved Radiation Work Permit (RWP) or Standing RWP (SRWP) and that no materials and equipment be removed from the Radiological Controlled Area (RCA) unless released by Radiation Protection and is so tagged.

SRWP #2, Entry for Routine Surveillance/Plant and System Operations, Revision 2, requires that each radiation worker monitor tools and equipment prior to removing them from the RCA or RCZ.

Contrary to the above, on March 3 and 4, 1994, contractor maintenance personnel failed to monitor tools and equipment prior to removing them from the auxiliary building roof in the RCA.

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

Reply to Violation 369, 370/94-06-01

1. Reason for the Violation:

RADCO Construction Services Inc. (RADCO) personnel assigned to perform roofing maintenance on the auxiliary building roof failed to follow SRWP 94-02 which requires a radiation survey of all materials removed from the Radiation Controlled Area (RCA). RADCO personnel had previously received the radiation protection training required for unescorted access inside the RCA which included the requirements for surveying all material leaving the RCA. Contrary to training received, RADCO personnel failed to ensure a radiation survey was conducted by Radiation Protection personnel once roofing maintenance was completed and all materials were collected onto a skid located beside the auxiliary building.

A cause of Work Practices, documents not followed correctly, is assigned because RADCO personnel failed to comply with SRWP 94-02, which requires the monitoring of personnel/tools/equipment when exiting the RCA. Since RADCO personnel had logged into the RCA on this SRWP, they were required to have read and understood the requirements of the SRWP. If the monitoring requirements were not understood, Radiation Protection personnel should have been contacted for guidance.

A cause of Verbal Communication, information sent but not understood, is assigned because information exchanged between Radiation Protection personnel, Commodities and Facilities personnel, and RADCO personnel in approximately the last 12 months had been misunderstood/misinterpreted. This had apparently occurred on several occasions.

Pre-job briefings had been held at several times during preparation for various roofing repairs/replacement and roof areas within the RCA were surveyed for contamination prior to the

start of roofing work. All areas surveyed in support of roofing work were found to be uncontaminated. Based on the survey results, the site sponsor and RADCO personnel believed it was unnecessary to have Radiation Protection personnel survey tools and new roofing materials when they were removed from the roof. They clearly understood that old roofing materials which were stripped from the roof required a survey since the debris had the potential to be contaminated. Since tools/equipment/materials had been removed from the roof on different occasions with the apparent knowledge of Radiation Protection personnel and this had not been questioned, the site sponsor and RADCO believed this was a satisfactory practice.

In addition to this misinterpretation, there was a breakdown in verbal communication on the afternoon of March 3, 1994. The conversation between RP Tech A and RADCO personnel resulted in several misunderstandings. RP Tech A believed that after a brief conversation with RADCO personnel, RADCO personnel clearly understood the materials would need to be surveyed before leaving the site. RP Tech A also recalls providing the telephone number for RP Spvr A to RADCO personnel so they could contact Radiation Protection prior to removing the material from the site. RADCO personnel perceived the brief information exchange as a casual conversation.

Information provided to RP Tech A by RADCO personnel was also not received. RADCO personnel stated they informed RP Tech A that one load of material had already left the site on March 3, 1994. RP Tech A has no recollection of this information. RADCO personnel also informed RP Tech A of their intention to remove the materials from the site on March 4, 1994 understanding that Radiation Protection would survey the materials while they were stacked on the ground prior to removal from the site.

A cause of Policy guidance/management expectations were not well defined or understood is assigned because McGuire Site Directive (MSD) 105, Control of Non-Assigned Individuals and Organizations Performing Work Or Directing Activities in the Station, does not provide adequate guidance for the control of non-assigned personnel working inside the protected area and no requirements exist for specific knowledge or qualifications of individuals assigned responsibility for controlling work performed by non-assigned personnel.

2. Corrective steps that have been taken and the results achieved:

- a. Upon discovery of the failure to survey the roofing materials and subsequent removal of the materials offsite, an RP Tech was sent to RADCO's establishment to conduct the survey. A survey of roofing equipment and materials removed from the McGuire site on March 3 and 4, 1994 indicated less than 0.05 mr/hr which is below the administrative limit.
- b. All roofing maintenance activities performed by RADCO inside the protected area were suspended until appropriate corrective steps could be implemented.

No similar events have occurred since RADCO discontinued roofing maintenance activities inside the protected area.

3. Corrective steps that will be taken to avoid further violations:

- a. As an interim corrective step, a Commodities and Facilities Directive, Control of Non-Assigned Individuals Performing Activities Within the Protected Area, will be developed

to ensure Commodities and Facilities sponsored activities inside the protected area are properly controlled. The directive will require non-assigned individuals that are not fully trained and qualified to work independently, to be supervised by a qualified individual. In addition, the directive will require the job sponsor to identify applicable station group contacts to ensure the effective communication of station requirements to non-assigned personnel and oversight of activities involving non-assigned individuals inside the protected area. This directive will be implemented by July 1, 1994.

- b. Nuclear System Directive (NSD) 105, Control of Interfacing Individuals and Organizations, will be revised to include requirements for the qualification of personnel assigned as site sponsors for non-assigned personnel and the specific Commodities and Facilities directive requirements addressed in corrective step (a) above. The revision to NSD 105 will ensure consistency in the control of non-assigned personnel at Duke Power Company's operating nuclear stations. Implementation of the revised NSD 105 will supersede the interim Commodities and Facilities directive addressed in corrective step (a) above. This revision to NSD 105 will be implemented by October 1, 1994.

4. Date when full compliance will be achieved:

Full compliance will be achieved by October 1, 1994.