

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



JOHN D. LEONARD, JR.
Resident Manager

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October 27, 1981
SERIAL: JAFP 81-1168

Eldon J. Brunner, Chief
Branch #1, Division of Resident
and Project Inspection
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

SUBJECT: INSPECTION NO. 50-333/81-18

Dear Mr. Brunner:

With reference to the inspection conducted by Mr. J. Linville of your office on August 1-31, 1981, at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of Section 2.201 of Part II of Title 10 of the Code of Federal Regulations, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated September 24, 1981, as received by the undersigned on September 28, 1981.

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted on August 1-31, 1981 and in accordance with the Interim Enforcement Policy, 45 FR 6675, (October 7, 1980), the following violations were identified:

- A. Technical Specification 6.8 (A) states in part: "Written procedures and administrative policies shall be established, implemented..."

Operations Department Standing Order No. 1, Operating Staff Responsibilities and Authorities, Revision 6, dated February 2, 1981 states under Senior Nuclear Operator (SNO) Responsibilities in paragraph 5.2.9, "He shall operate in accordance with approved procedures unless immediate and unforeseen action is required to ensure the safety of the reactor, plant or personnel."

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Contrary to the above, at about 7:30 a.m. on July 31, 1981, the SNO racked out the breakers for the High Pressure Coolant Injection (HPCI) System Turbine Steam Line Inside Containment Isolation Valve 23MOV15 and Outside Containment Isolation Valve Bypass Valve 23MOV60, preventing closure on an automatic isolation initiation signal to permit an Instrument and Control Technician to lift the leads on the temperature switch generating a HPCI Turbine Steam Line high area temperature isolation signal without using an approved procedure.

WACP No. 10.1.1, Procedure for Control of Maintenance, Revision 3, dated March 16, 1981, paragraph 7.1.1 states in part, "The Work Request/Event/Deficiency (WRED) form shall be utilized as a minimum for the following:

- a. Reporting any deficiencies on safety related systems or components requiring work (maintenance, calibration, etc.) to correct..."

Paragraph 7.2.1 states in part, "The Work Tracking Form (figure 8.4), a three page form shall be used for the following:

- 7.2.1.1 To properly pre-plan, track, control and document corrective maintenance (normally initiated on a WRED form) for Category 1, Safety Related for QC inspection required work."

Contrary to the above, at about 7:30 a.m. on July 31, 1981, an Instrument and Control Technician lifted the leads on the safety related HPCI System Turbine Steam Line High Area Temperature Isolation Switch to produce an isolation signal without an approved WRED or Work Tracking Form.

This is a Severity Level IV Violation (Supplement I).

- B. Technical Specification 6.11 (A), High Radiation Area states in part, "In lieu of the 'control device' or 'alarm signal' required by paragraph 2.203 (c) (2) of 10 CFR20, each High Radiation Area (i.e., > 100 mrem/hr.) in which the intensity of radiation is 1000 mrem/hr. or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)..."

Contrary to the above, at approximately 2:15 p.m. on August 7, 1981, gate number RW 272/12 was found to be open. Licensee Survey No. 39194 dated August 7, 1981 showed that the general area dose rate in the area made accessible by this open gate was up to 300 millirem per hour.

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

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- C. Technical Specification 6.11 states in part, "Procedures for personnel radiation protection shall be prepared and adhered to for all plant operations."

Radiation Protection Operating Procedure II.B.6, Control of Radiation Work Permits (RWP's), Section 6.2.4, dated December 26, 1979, states in part, ".... a leadman ... is responsible for personnel working on the RWP and ensures that they obey its instructions."

Contrary to the above, on August 14, 1981, a worker who signed in on Radiation Work Permit No. 3489 and entered the west crescent area, the work area controlled by the Radiation Work Permit, failed to follow the special instructions listed on the Radiation Work Permit by not removing his personal outer clothing and taping the rubber gloves and cotton boots to the protective clothing.

Radiation Protection Operating Procedure II.B.7, Obtaining and Using a Radiation Work Permit (RWP), Section 7.6.1.8, dated December 26, 1979, states in part, "The RWP is kept on the 'clean' side of the step-off-pad and personnel enter the work area sign in on the Sign-In/Sign-Out sheet (back of RWP) writing in their entry time and dosimeter reading."

Contrary to the above, on August 18, 1981, a worker whose name was listed on a Radiation Work Permit No. 3544, and who was working in the area controlled by the Radiation Work Permit, failed to enter his entry time and dosimeter reading on the Radiation Work Permit.

This is a Severity Level V Violation (Supplement IV).

RESPONSE TO NOTICE OF VIOLATION

- A. As noted in the inspection details, work on the high pressure coolant injection (HPCI) system area high temperature isolation and indication system was initiated on the non-safety related portion. As the work progressed, it became evident that a portion of the safety related components were also involved. At this point, the technician and operator on duty took steps to prevent a possible undesired isolation of the HPCI steam supply. These actions were in violation of plant procedures relating to keeping the Shift Supervisor informed of work being conducted and the performance of maintenance on safety related equipment.

As also noted in the inspection details, the technician had discussed this work with his supervisor. However, this discussion did not take place until after some work involving safety related equipment was started.

The work was immediately terminated by the Shift Supervisor when he became aware of the problem and was later completed utilizing the proper procedures. Formal training has been conducted for the personnel involved to prevent recurrence. This training was completed on October 23, 1981, thus bringing the FitzPatrick Plant into full compliance with respect to this item.

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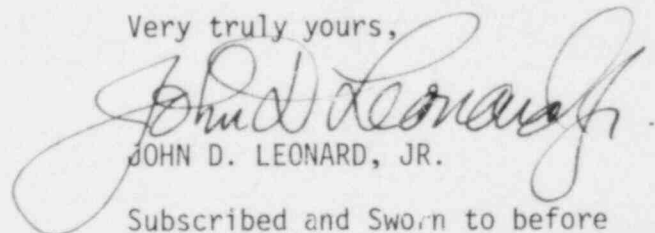
- B. The high radiation area access door in question was immediately closed to bring the FitzPatrick Plant into full compliance with respect to this item.

With respect to preventing recurrence, periodic checks of high radiation area gates will continue. In addition, the training department will be directed to strongly emphasize the importance of maintaining high radiation area gates either closed or guarded to meet the requirements of 10 CFR20. The Resident Manager, in preparation for the forthcoming outage, has personally stressed to contractor supervisors, the importance of following internal plant procedures. Further, plant management will issue a memorandum to all personnel reminding them of their responsibility with respect to the requirements of 10 CFR20 and plant procedures.

The FitzPatrick Plant staff is fully aware that these actions are essentially the same as those taken in response to earlier items of non-compliance involving the same problem. Accordingly, we have initiated discussions with other facilities in an effort to determine how these other facilities may be approaching similar or related problems. In addition, the plant staff is evaluating the feasibility of installing a remote (control room) monitoring system for high radiation area access gates.

- C. The Radiological and Environmental Services Department conducted an investigation with respect to the examples cited in this item and considers them to have resulted from extenuating conditions. The item of non-compliance has been discussed with the individuals involved to provide assurance that they fully understand their responsibilities and the requirements associated with radiation work permits. In addition, specific training associated with the requirements for performing work under radiation work permits was conducted along with the training conducted to prevent recurrence of Item A. Full compliance was achieved on October 23, 1981.

Very truly yours,



JOHN D. LEONARD, JR.

JDL:VC:brp

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Subscribed and Sworn to before
me this 27th day of October, 1981



Notary Public

BEVERLY R. PRUCNAL, #4628499
Notary Public - State of New York
Appointed in Oswego County
My Commission Expires March 30, 1982