

# The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

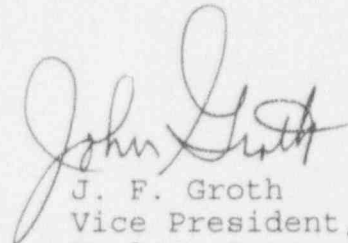
August 15, 1994  
ST-HL-AE-4858  
File No.: G02.04  
10CFR2.201

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

South Texas Project  
Unit 2  
Docket No. STN 50-499  
Reply to Notice of Violation 9423-01  
Regarding Failure to Perform a Radiological Survey

Houston Lighting & Power has reviewed Notice of Violation 9423-01 dated July 15, 1994, regarding a failure to survey a scaffold as required by the Radiation Work Permit, and submits the attached reply.

If there are any questions regarding this matter, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8664.

  
J. F. Groth  
Vice President,  
Nuclear Generation

MAC/esh

Attachment: Reply to Notice of Violation 9423-01

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Houston Lighting & Power Company  
South Texas Project Electric Generating Station

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Response to Notice of Violation 9423-01

I. Statement of Violation:

During an NRC inspection conducted on June 13-17, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

Technical Specifications 6.8.1 states in part, that written procedures shall be established, implemented, and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33.

Regulatory Guide 1.33, Section 1(d) of Appendix A, Section 7.e, recommends radiation protection procedures for ". . . (1) Access Controls to Radiation Areas Including a Radiation Work Permit System . . . "

Licensee Procedure OPGP03-ZA-0010, "Plant Procedure Adherence," Section 4.1.1, states, in part, that procedures shall be strictly adhered to when performing plant activities.

Licensee Procedure OPGP03-ZR-0051, "Radiological Access and Work Controls," Section 5.3.1, "General Guidelines for Working in the RCA," states in part: "RWP instructions, HP instructions, radiological postings and barriers, and other warning devices shall be adhered to at all times."

Radiation Work Permit 94-2-0057-A dated February 1, 1994, Special Instructions 1, states, in part: "Areas in the overhead (above 6 feet) are not routinely surveyed and are not usually accessible until the scaffolding is erected. Do not lean, lay, sit, or, stand on support structures until surveyed and cleared by HP when building into overhead. Ensure HP has surveyed pipes, valves, and components, prior to coming within 12" as scaffolding is being erected into the overhead."

Contrary to the above, as of June 13, 1994, the overhead in Room 4 of the Refueling Handling Building had not been surveyed after scaffolding had been erected and used by workers since February 1, 1994.

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

II. Houston Lighting & Power Position:

Houston Lighting & Power concurs with the violation as stated except for the following minor correction. The statement in the Notice of Violation incorrectly states that "scaffolding had been erected and used by workers since February 1, 1994." February 1, 1994 was the effective date of the Radiation Work Permit. This Radiation Work Permit is used for erection of scaffolding in most locations within the radiologically controlled area. The scaffold in Room 004 of the Fuel Handling Building which is the subject of this violation was erected on May 17, 1994 and was used for the first time on that date.

III. Reason for Violation:

The reason for the violation is an improper assumption by Health Physics personnel that since no radioactive source term was known to exist in the area there was not a need for a survey.

On May 17, 1994, carpenters were tasked to build a scaffold in the Fuel Handling Building, Room 004 to gain access to a monorail mounted hoist. The Radiation Work Permit used for erecting, moving, and disassembling scaffolding in clean areas, contained the following special instruction:

Notify Health Physics of work location and job scope before starting work.

Caution

Areas in overhead (above 6 feet) are not routinely surveyed and are not usually accessible until scaffolding is erected. Do not lean, lay, sit, or stand on plant structures until surveyed and cleared by Health Physics when building into overhead. Ensure Health Physics has surveyed pipes, valves, and components, prior to coming within 12" as scaffolding is being erected into overhead.

The caution statement requires Health Physics to perform a survey of plant structures and components made accessible by erection of scaffolding. Radiation and/or contamination levels in such areas are not routinely measured, but are measured when such areas are made accessible. No exceptions to the survey requirement are allowed by the wording of the caution statement regardless of the potential for elevated radiation or contamination levels in the overhead area.

The individuals who built the scaffold contacted Health Physics and the Health Physics representative indicated to them that the area was not contaminated and told them to proceed with their job. Because the area where the scaffolding was being built contained no sources of radiation or contamination, the Health Physics representative judged that radiation and contamination measurements were not warranted without consulting the Radiation Work Permit for the required instructions.

IV. Corrective Actions:

A survey of the scaffolding in Room 004 was performed and the results were that no radiation or contamination levels were found.

The following corrective actions have been taken or will be taken to prevent recurrence:

1. A Health Physics Night Order was issued instructing the staff to annotate on the back of the scaffold inspection tag that a survey has been performed. The existing scaffolding in both Units were resurveyed and the scaffolding inspection tags were properly annotated.
2. A training bulletin was issued to Health Physics staff discussing this violation and the importance of Radiation Work Permit instructions.
3. A method will be established to include the performance of radiological surveys in the standard scaffold erection process. This action will be completed by August 31, 1994.

V. Date of Full Compliance:

Houston Lighting & Power is in full compliance.