

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 189 Wadsworth, Texas 77483

May 15, 1991
ST-HL-AE-3764
File No.: G02.04
10CFR2.201

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

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498 and 50-499
Reply to Notice of Violation 9109-01 Entry into
High Radiation Area in Violation of Technical Specification

Houston Lighting & Power Company has reviewed the Notice of Violation issued as a result of NRC Inspection Report 91-09 dated April 15, 1991 and submits the attached reply.

If you should have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628.

W. H. Kinsey, Jr.
W. H. Kinsey, Jr.
Vice President,
Nuclear Generation

RAD/sgs

Attachment: Reply to Notice of Violation 9109-01

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A Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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Revised 01/29/91

LA/NRC/

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter

Houston Lighting & Power
Company, et al.,

South Texas Project
Units 1 and 2

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Docket Nos. 50-498
50-499

AFFIDAVIT

W. H. Kinsey, Jr. being duly sworn, hereby deposes and says that he is Vice President, Nuclear Generation of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to NRC Notice of Violation 9109-01 "Entry into High Radiation Area / Violation of Technical Specification"; is familiar with the content thereof, and that the matters set forth therein are true and correct to the best of his knowledge and belief.

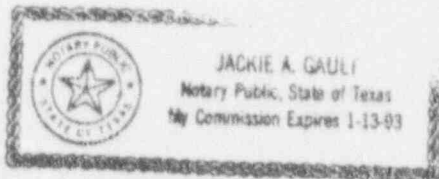
W. H. Kinsey, Jr.

W. H. Kinsey, Jr.
Vice President,
Nuclear Generation

STATE OF TEXAS

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Subscribed and sworn to before me, a Notary Public in and for The
State of Texas this 15th day of MAY, 1991.



Jackie A. Gault

Notary Public in and for the
State of Texas

I. Statement of Violation:

Technical Specification 6.12.1 states that pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 millirem per hour at 45 centimeters (18 inches) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrances thereto shall be controlled by requiring issuance of a radiation work permit (RWP).

Contrary to the above, on March 20, 1991, the inspector observed an individual entering the radioactive waste truck bay of Unit 1, an area established and posted by the licensee as a high radiation area, under RWP 91-1-0035 which did not allow entry into high radiation areas.

This is a Severity Level IV violation. (Supplement IV)(498/9109-01; 499/9109-01)

II. Houston Lighting & Power Position:

HL&P concurs that this violation occurred.

III. Reason for Violation:

The cause of this event was failure of the security officer to follow the specific instructions of the applicable radiation work permit due to miscommunications. The individual, a security officer responding to patrol assignments and alarms in the area, apparently misunderstood a conversation with Health Physics personnel regarding access to a radioactive waste truck bay door. Contributing to the event was that the individual did not demonstrate adequate knowledge of radiation work permits and posting restrictions.

IV. Corrective Actions:

1. Radiation Protection personnel verified that no exposures resulted. The area was resurveyed and high radiation area postings were removed.
2. The individual's access privilege to the Radiologically Controlled Area was revoked until he received remedial training.
3. During similar operations conducted in the radioactive waste truck bay on the following day several actions were taken to prevent recurrence which are documented in NRC Inspection Report 91-09.

4. The following actions are being taken prior to transfer High Dose Rate, High Integrity Containers (HIC).
 - a. Access to areas outside of the normally posted Radiologically Controlled Area in which transient radiation areas may exist while the HIC is unshielded will be controlled.
 - b. The radioactive waste truck bay telephone number will be included on the posting on the truck bay door or a Radiation Protection technician will be posted at the door if the door is required to be posted as a High Radiation Area.
 - c. Security, Health Physics Operations, and Plant Operations personnel will be notified prior to removing the HIC from the shielded container and after the HIC is returned to a shielded container.
 - d. A plant announcement is made to inform personnel prior to transfer of the HIC and upon completion of transfer.

The Radioactive Waste Shipments procedure will be revised to include the above prerequisites for removal of High Dose Rate, High Integrity Containers. This action will be completed by June 14, 1991.

5. A memorandum was issued to Health Physics personnel to reaffirm that verbal instructions should never indicate that Radiation Work Permit (RWP) instructions can be disregarded unless personnel safety is at risk.
6. Radiation Protection supervisors are scheduled to participate in Radiation Worker training classes to discuss this event and emphasize compliance with radiation work permits and radiological postings.

V. Date of Full Compliance: -

HL&P is in full compliance at this time.