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Gregory M. Rueger  
Senior Vice President and  
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Nuclear Power Generation

January 27, 1995

PG&E Letter HBL-95-010



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

Docket No. 50-133, OL-DPR-7  
Humboldt Bay Power Plant, Unit 3  
Licensee Event Report 3-95-001-00  
Thermoluminescent Dosimeter Missing from Offsite Radiation  
Monitoring Station Due to Unknown Reasons

Gentlemen:

Pursuant to 10 CFR 50.73(a)(2)(i)(B), PG&E is hereby submitting the enclosed Licensee Event Report concerning the inability to perform a required environmental radiation measurement required by the Technical Specifications because dosimeters were missing from an offsite monitoring station.

This event did not affect the health and safety of the public.

Sincerely,

A handwritten signature in dark ink, appearing to read "Greg Rueger". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gregory M. Rueger

cc: L. J. Callan  
Kenneth E. Perkins  
Michael K. Webb  
Humboldt Distribution  
INPO

Enclosure

HB3-93-QC-N001

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Humbolt Bay Power Plant, Unit 3</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 1 3 3</b>	PAGE (3) <b>1</b> OF <b>5</b>
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TITLE (4) **Thermoluminescent Dosimeter Missing from Offsite Radiation Monitoring Station Due to Unknown Reasons**

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MON	DAY	YR	YR	SEQUENTIAL NUMBER	REVISION NUMBER	MON	DAY	YR	FACILITY NAMES		DOCKET NUMBER (5)		
12	30	94	95	0 0 1	0 0	1	27	95			0 5 0 0 0		

OPERATING MODE (9) **N** THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11)

POWER LEVEL (10) **0 0 0** ☒ 10 CFR 50.73(a)(2)(i)(B) OTHER -  
(Specify in Abstract below and in text, NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12) **Roy B. Willis, Plant Engineer** TELEPHONE NUMBER  
AREA CODE **707** NUMBER **444-0700**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS

SUPPLEMENTAL REPORT EXPECTED (14) ☐ YES (If yes, complete EXPECTED SUBMISSION DATE) ☒ NO

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

ABSTRACT (16)

On December 30, 1994, a technician was performing the quarterly exchange of the thermoluminescent dosimeters (TLDs) at offsite environmental radiation monitoring stations when he found that one of the offsite stations (identified as "No. 1," on Figure V-1 of the Technical Specifications (TS)) did not have a TLD packet and that the TLD mounting fixture was also missing. The TS require that the dosimeters at these stations be monitored at least quarterly (TS Section V.B.4). According to the documentation for Surveillance Test Procedure 3.16.11, the missing packet had been installed on September 29, 1994. A new TLD packet and mounting fixture were installed on December 30, 1994 for the first quarter 1995 monitoring period.

The packet and the mounting fixture are believed to have been removed by unknown parties, possibly after the fixture was dislodged by high winds. The root cause of the event was determined to be ineffective corrective action from a previous LER and the design of the TLD mounting fixture.

The corrective action to prevent recurrence is to investigate the redesign of the TLD station to minimize the possibility of loss or theft.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		95	-	0	0	1	-	0
							2	OF 5

TEXT (17)

I. Initial Conditions

Unit 3 was in a SAFSTOR decommissioning mode.

II. Description of Event

A. Event

On December 30, 1994, a thermoluminescent dosimeter (TLD) was found missing from an offsite environmental radiation monitoring station where quarterly monitoring is required by Technical Specification (TS) Section V.B.4. The TLD packet had been installed on September 29, 1994.

B. Discovery

On December 30, 1994, a technician performing the quarterly exchange of the TLDs at offsite environmental radiation monitoring stations found that one of the stations (identified as "No. 1," on Figure V-1 of the TS) did not contain a TLD packet and the mounting fixture.

A new TLD packet and mounting fixture were installed on December 30, 1994 for the first quarter 1995 monitoring period.

C. Inoperable Structures, Components, or Systems that Contributed to the Event

None.

D. Dates and Approximate Times for Major Occurrences

- |  |   |
|--|---|
| <p>1. September 29, 1994:</p>  | <p>As part of Surveillance Test Procedure (STP) 3.16.11, "Quarterly Environmental Monitoring TLD Exchange," a packet containing TLD was installed at Station "No. 1."</p> |
| <p>2. Sometime Between September 29, 1994 and December 30, 1994:</p> | <p>Event Date: The TLD packet and mounting fixture were removed.</p>  |

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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3. December 30, 1994:

Discovery Date: During the performance of STP 3.16.11, the TLD installed September 29, 1994 was found missing along with the mounting fixture. A new TLD and mounting fixture were installed for the first quarter 1995 monitoring period.

E. Other Systems or Secondary Functions Affected

None.

F. Method of Discovery

The event was discovered when a technician who was performing the quarterly exchange of the TLDs at the offsite environmental radiation monitoring stations found that Station "No. 1," on Figure V-1 of the TS did not contain a TLD packet and mounting fixture.

G. Operator Actions

The TLD packet and a replacement mounting fixture were installed in the monitoring station for the next quarterly monitoring period.

H. Safety System Responses

None.

### III. Cause of Event

A. Immediate Cause

The packet and the mounting fixture are believed to have been removed by unknown parties, possibly after the fixture was dislodged by high winds.

B. Root Cause

The root cause is the ineffective corrective action from a previous LER (3-94-001-00) and the design of TLD mounting fixture.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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### IV. Analysis of Event

The TLD exchange is performed by a Radiation and Process Monitor (RPM) according to STP 3.16.11. Review of the STP data sheets and discussions with the RPM indicate that the previous TLD exchange (September 29, 1994) was normal. A Technical Review Group concluded that the TLD packet had been removed from the station by an unknown individual sometime between September 29, 1994 and December 30, 1994.

The loss of the TLD caused an inability to perform the environmental station radiation measurement for the fourth quarter 1994. The loss of the TLDs from the station has no impact beyond the loss of data, and the only use of this data is in the annual report to the NRC. An attempt to obtain substitute equivalent data (from the TLDs used by the State of California at the same location) is being made.

The health and safety of the public were not affected by this event.

### V. Corrective Actions

#### A. Immediate Corrective Actions

1. The missing TLD packet was replaced with the packet for the next quarterly monitoring period
2. The condition of the other stations was checked as part of the STP and no abnormalities were found.
3. An attempt will be made to obtain and evaluate substitute data, if available, from the State monitoring system.

#### B. Corrective Action to Prevent Recurrence

1. Investigate redesign of station to minimize possibility of loss or theft.

### VI. Additional Information

#### A. Failed Components

None.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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### B. Previous LERs on Similar Events

Licensee Event Report 3-94-001-00, "Thermoluminescent Dosimeter Missing from Onsite Radiation Monitoring Station Due to Unknown Reasons." The corrective action from the March 1994 event was not effective in preventing a recurrence of a missing TLD packet.