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Southern Nuclear Operating Company

the southern electric system

10 CFR 2.201

March 6, 1992

J. D. Woodard
Vice President
Farley Project

Docket Nos. 50-348
50-364

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

Joseph M. Farley Nuclear Plant
Reply to Notice of Violation
Inspection Report Numbers 50-348/92-01, 50-364/92-01
Item Numbers 50-348/92-01-02, 50-364/92-01-02
NRC Inspection of January 6-10, 1992

Gentlemen:

This letter refers to the violation cited in the subject inspection report.
The violation states:

Technical Specification (TS) 6.11 states that procedures for radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

10 CFR 20.203(f)(1) and (2) require, in part, for containers, except as provided in paragraph (f)(3), that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The label is to bear the radiation caution symbol and the words "Caution-Radioactive Material" or "Danger-Radioactive Material." The label shall also provide sufficient information (as appropriate, the information will include radiation levels, kinds of materials, estimate of activity, etc.) to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

10 CFR 20.203(f)(3)(vi) further states that labeling is not required for containers which are accessible (for example, containers in locations such as water filled canals, storage vaults, or hot cells) only to individuals authorized to handle or use them, or to do work in the vicinity thereof, provided that the contents are identified to such individuals by a readily available written record.

Farley Nuclear Procedure (FNP)-0-RCP-57, Radioactivity and Potentially Radioactive Material Handling, Revision 16, dated March 28, 1991, requires in part, the following: (1) Item 3.1 - Items that have been determined to be radioactive by a health physics (HP) representative shall be identified as radioactive material using the appropriate bag, tag, labels, or signs; (2) Item 3.1.1 - The label, bag, tag, or sign may include, at the HP technician's discretion, information such that the person handling the material or working in the vicinity of the material can implement appropriate actions and precautions to minimize their exposure; (3) Item 3.1.1.1 - A contact maximum radiation level on the surface of radioactive material or container should be considered

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the minimum for personnel awareness; and (4) Item 3.1.1.2 - Other information such as fixed/smearable radioactive contamination levels, isotopes, etc. Further, a note to Item 3.1.1.2 states: Radioactive materials located in a rad bag or within boundaries of an area posted as "Radioactive Material" do not require individual tags, labels, or signs.

Contrary to the above, the FNP-O-RCP-57 procedure for labeling radioactive material in accordance with 10 CFR 20.203 was inadequate in that it contained an internal inconsistency. The note to Item 3.1.1.2 conflicted with Item 3.1.1.1, in that radioactive materials in a rad bag (containers) do not, as a minimum, have to be labeled with a contact maximum radiation level.

In addition, the licensee was not adequately implementing the 20.203(f)(3)(vi) labeling exemption for which procedure FNP-O-RCP-57 was taking credit. Specifically, the licensee had not provided a written record of the contents of all radioactive material that was readily accessible to workers. Although area postings often highlighted the contents and/or characteristics of a specific container within the area, this methodology was not uniformly employed for all containers of radioactive material present within the posted areas.

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

Admission or Denial

The requirements of 10 CFR 20.203 were violated in that FNP-O-RCP-57 did not require the contents of all radioactive material containers to be included on the required written record.

In the inspection report it is stated that the failure to properly label radioactive material could result in unnecessary exposure of personnel to radiological conditions. Although Southern Nuclear is concerned about the failure to properly label radioactive containers, the possibility of unnecessary exposure is considered remote for the following reasons. All containers that were improperly labeled were inside a radiation controlled area. Further, these containers were located in segregated and specially posted areas for radioactive material storage. Finally, no containers that were improperly labeled had high dose rates.

Reason for Violation

This violation was caused by a procedural inadequacy. Health Physics Supervision improperly interpreted the regulation; therefore, the procedure was not written correctly to ensure radioactive material was properly labeled.

Corrective Action Taken and Results Achieved

The boxes that were identified as a concern were individually tagged listing radiation levels and contents.

Corrective Steps To Avoid Further Violations

Radioactive material containers will be labeled as required by 10 CFR 20.203. FNP-0-RCP-57 has been revised to provide additional guidance on labeling radioactive material containers such that the procedure requires labeling of all radioactive material containers and requires that radioactive material containers with radiation levels which present a radiation area at 18 inches will be tagged listing radiation level, contents and applicable contamination levels of contents.

Health Physics personnel will be trained on this change.

Date of Full Compliance

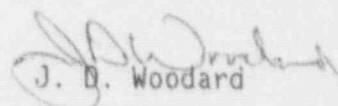
March 16, 1992

Confirmation

I affirm that this response is true and complete to the best of my knowledge, information, and belief. The information contained in this letter is not considered to be of a proprietary nature.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


J. D. Woodard

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cc: Mr. S. D. Ebner
Mr. S. T. Hoffman
Mr. G. F. Maxwell