

APPENDIX A
NOTICE OF VIOLATION

Power Authority of the State of New York
James A. FitzPatrick Nuclear Power Plant
P. O. Box 41
Lycoming, New York 13093

Docket No. 50-333
License No. DPR-59

As a result of the inspection conducted on April 22-26, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

A. Technical Specification 6.11, requires in part, that procedures for personnel radiation protection be prepared and adhered to and that these procedures be formulated to maintain radiation exposures received during operation and maintenance as far below the limits specified in 10 CFR 20 as practicable.

1. Procedure RPOP-4, "Radiation Work Permit," specifies in part, in section 4.10.2 that it is the leadman's responsibility to assure that all personnel who sign in on the Radiation Work Permit (RWP) comply with any conditions on the RWP.

(a) RWP No. 3997, dated April 24, 1985 required that hoods be worn during removal/replacement of IRM/SRM drytubes.

Contrary to the above, at about 6:00 p.m. on April 24, 1985, the leadman for RWP No. 3997 did not assure that all personnel complied with the RWP. Two individuals, signed in on the RWP and standing by to perform work, did not have on hoods.

(b) RWP No. 3930-S, dated April 23, 1985 required that hoods be worn in the CRD Rebuild Room when respirators are worn.

Contrary to the above, at about 2:30 p.m., on April 23, 1985, the leadman for RWP No. 3930-S did not assure that all personnel complied with the RWP. One individual inside the CRD Rebuild Room, was wearing a respirator, did not have on a hood.

2. Procedure RPOP-4, "Radiation Work Permit," requires in part in section 4-10.4 that if a regular Radiation Work Permit (RWP) is needed for more than one shift, the leadman shall return it to the Radiation Protection Office so that it can be turned over to the new leadman for acceptance and reapproval by Radiation Protection.

Contrary to the above, on April 22, 1985 regular RWP No. 3900 was needed and used for more than one shift; was not returned to the

8507030655 850621
PDR ADOCK 05000333
Q PDR

OFFICIAL RECORD COPY

IR FITZ 85-12 - 0004.0.0
06/19/85

Radiation Protection Office for turnover to the new leadman for acceptance; and was not reapproved by Radiation Protection.

3. RPOP-9, "Radiological Survey Techniques" specifies in part in section 5.6, that the general guidance of Table 6 (contained in that procedure) shall be used in performing radiation work permit surveys. Table 6 requires that a conservative approach to monitoring shall be taken until it is shown a less conservative approach is justified.

Contrary to the above, at about 6:00 p.m. on April 24, 1985 a conservative approach to monitoring a Drytube Cutting Tool was not taken in that personnel pulled the tool out of the reactor cavity and were permitted to handle the tool prior to radiation surveys being made of the tool. A radiation protection technician with a survey meter was about 15 feet away when the tool was removed, handled, and bagged by two workers.

4. Procedure REP 1, "ALARA Reviews", requires, in part, in section 2.1.6 and 5.2.3, that ALARA reviews for jobs whose man-rem total exceeds 10 man-rem be approved by the Radiological Engineer, the Radiological and Environmental Services Superintendent, and the Superintendent of Power, as evidenced by their signatures thereon.

Contrary to the above, as of April 24, 1985, an ALARA review performed February 17, 1985 for Removal, Transport and Replacement of Control Rod Drives, which indicated a man-rem total of 12.6 man-rem was not reviewed as required as evidenced by the lack of signature of the Radiological Engineer, the Radiological and Environmental Services Superintendent, and the Superintendent of Power. Work commenced on this task on or before April 23, 1985.

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

- B. Technical Specification 6.8, requires in part, that procedures be established, implemented, and maintained which meet the requirements and recommendations of Regulatory Guide 1.33, 1972. Regulatory Guide 1.33, 1972, recommends that procedures for restrictions and activities in high radiation areas and equipment control (e.g., locking and tagging) be established. In addition, Technical Specification 6.11 (A), "High Radiation Area," requires that, locked doors be provided to prevent authorized entry into areas in which the intensity of radiation is greater than 1,000 millirem/hour, and that the keys to such areas be maintained under the administrative control of the Shift Supervisor on duty and/or the Radiological Environmental Services Superintendent.
 1. Contrary to the above, as of April 26, 1985, and for an undetermined period of time prior to this time, 'MR' keys, which provide general (master) access to areas with radiation intensities less than 10,000 mR/hr were not under the administrative control of the Shift Supervisor on duty and/or the Radiological and Environmental Services Superintendent.

2. Procedure No. 19, "Procedure for Control of Non-Security Related Keys Issued to the Operation Department," which, among other things, controls issuance of individual area, high radiation area access keys by shift supervision, requires in part in section 7, that the on-coming Shift Supervisor review the key log prior to taking shift to determine if any keys are out or missing.

Contrary to the above, on April 23, 1985, neither the on-coming second shift Shift Supervisor nor his assistant reviewed the key log prior to taking shift to determine if any keys were out or missing.

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

Pursuant to the provisions of 10 CFR 2.201, Power Authority of the State of New York is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.