

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

As a result of the inspection conducted on April 23-26 and May 1-2, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

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

The following examples of failure to follow radiological access control procedures were identified:

- a. Procedure 7.04 allows only emergency use of Door 168 for auxiliary building ingress and egress unless prior arrangements with the radiation safety office have been made.

Contrary to this, Door 168 has been used routinely for normal auxiliary building ingress and egress without radiation safety approval. This practice has continued for an extended period of time.

- b. Procedure 7.04 allows workers to log into the controlled area prior to the first entry of a work shift and log out after the last entry of the shift only if authorized on the RWP they are working under. Also, the Staff Health Physicist must authorize in writing, specific persons or groups of persons to log themselves in and out of the controlled area.

Contrary to this, although none of the RWPs in effect at the time of this inspection authorized the beginning of shift/end of shift log in/out option, such practice was common. Also, although the operators keep their dose control cards near their work area and log themselves in and out of the controlled area, no written authorization for this practice could be located.

- c. Procedure 7.04 requires that persons entering posted areas be listed on an RWP and wear a self-reading dosimeter.

Contrary to this, on April 29, 1985, two workers entered a posted radiation area near the SRW tank to perform instrument surveillance without being listed on an RWP and without wearing the required self-reading dosimeters.

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

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

The following examples of failure to follow radioactive material control procedures were identified:

- a. Procedure HP 6.33 requires that contaminated materials be labeled "Caution - Radioactive Material."

Contrary to this, the inspector and the radiation safety technicians found several pieces of unlabeled contaminated tools and material outside the radiologically controlled area.

- b. Procedure HP 2.14 requires that tools and equipment leaving the controlled area be surveyed for radioactive contamination.

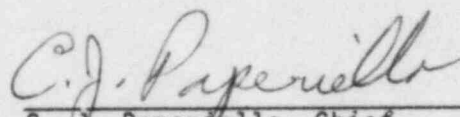
Contrary to this, on May 1, 1985, the inspector observed a contractor employee exiting the controlled area through access control with a canvas bag of hand tools that had not been surveyed.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated

5/21/85


C. J. Paparelli, Chief
Emergency Preparedness and
Radiological Protection Branch