

JUL 25 1985

RSB

Docket No. 50-133

Pacific Gas and Electric Company
77 Beale Street, Room 1451
San Francisco, California 94106

Attention: Mr. J. D. Shiffer, Vice President
Nuclear Power Generation, Licensing

Gentlemen:

Subject: Response to Notice of Violation

Thank you for your letter dated July 12, 1985, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated June 12, 1985.

We consider the meeting held at our office on July 18, 1985 to have been a beneficial discussion of radiation protection issues at PG&E. The steps you identified appear to include adequate measures to address our concerns regarding radiation protection programs.

Your corrective actions will be verified in a future inspection.

Your cooperation with us is appreciated.

Sincerely,

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Ross A. Scarano, Director
Division of Radiation Safety
and Safeguards

cc:

Jim Knight, NRR
P. A. Crane, Attorney, PG&E
S. D. Skidmore, PG&E
E. Weeks, Plant Superintendent, PG&E
State of CA

bcc: RSB/Document Control Desk (RIDS)
Mr. J. Martin

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PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

July 12, 1985

PGandE Letter No.: HBL-85-031

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

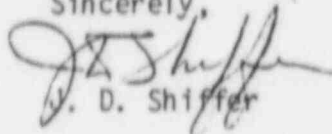
Re: Docket No. 50-133, OL-DPR-7
Humboldt Bay Power Plant, Unit No. 3
Response to IEIR 50-133/85-02 -- Notice of Violation

Dear Mr. Martin:

NRC Inspection Report 50-133/85-02, dated June 12, 1985, contained one Severity Level IV violation and two Severity Level V violations. PGandE's response to these notices of violation is enclosed.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,


J. D. Shiffer

Enclosure

cc: P. B. Erickson
Service List

Due
~~8507220290~~

IEC 1

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT NO. 50-133/85-02

On June 12, 1985, NRC Region V issued one Severity Level IV and two Severity Level V Notices of Violation ("Notices") as part of NRC Inspection Report 50-133/85-02 for Humboldt Bay Power Plant Unit No. 3. The Notices cited:

- o Failure to comply with the requirements of a procedure for fuel movements, (Severity Level V).
- o Access to high radiation area was not equipped with a control device, alarm, or lock, (Severity Level IV).
- o A concern that a survey around a radioactive waste container and shielding ring was not documented, (Severity Level V).

In the subject inspection report, the inspector stated that he was given the "impression" by the licensee representatives that strict compliance with NRC requirements was a matter of judgment. Compliance with NRC requirements is not now and has never been considered a matter of judgment or discretion. The staff of the Humboldt Bay Power Plant has always strived to comply with NRC requirements as they understood them.

A. FAILURE TO COMPLY WITH PROCEDURAL REQUIREMENTS

STATEMENT OF VIOLATION

"Technical Specification IX.F.1.b states in part that detailed written procedures shall be adhered to for fuel handling operations. Plant Manual Temporary Procedure 5/9/85 No. 1 states in part that only one assembly at a time is permitted in the fuel disassembly station and that the assembly is to be moved to the out-of-stock warehouse before another is removed from the new fuel storage vault.

Contrary to the above procedure, on May 14, 1985 the inspector observed one disassembled fuel assembly with 5 pins on the work table, the remainder of the assembly on a fork truck at the refueling building doors when a second fuel assembly was removed from the new fuel storage vault and placed in the work fixture.

This is a Severity Level V Violation (Supplement VI)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

As part of efforts to return unirradiated fuel to the vendor, fuel assemblies were disassembled and individual fuel rods were decontaminated

and then placed on a "clean table." These activities were performed in one work area. When the results of a final radiation survey indicate that the rods are decontaminated, they are transferred from the work area to shipping containers. Contrary to the Technical Specification (TS) V.B.7 requirement that transfer of fuel assemblies within work locations "shall be limited to one fuel assembly in any location", a fuel assembly was moved from the new fuel storage vault into the disassembly area while 5 fuel pins from the previous assembly were still on the "clean table" awaiting survey results. The cause of the event was insufficient attention to the requirements of the Technical Specifications by personnel involved in the work. On June 13, 1985, PGandE submitted License Event Report 85-003-00 (Letter No. HBL-85-025) concerning this incident.

Corrective action included revising the temporary procedure to define the fuel disassembly/decontamination area and the "clean table" area as separate work locations and require that a licensed operator be present at each specific work location. In accordance with TS V.B.7, the revised procedure clearly specifies that only one fuel assembly at each work location. Personnel involved in these efforts have been provided with additional training on the TS requirements.

CORRECTIVE STEPS WHICH WILL BE TAKEN

Based on the actions described above, PGandE believes that adequate corrective actions have been taken. Therefore, no additional corrective steps are necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

B. ACCESS TO HIGH RADIATION AREA

STATEMENT OF VIOLATION

"10 CFR 20.203(c)(2) states that each access point to a high radiation area shall be equipped with a control device, alarm or be maintained locked except when access is required with positive control over each entry.

Contrary to this requirement, on May 20, 1985 access to non temporary high radiation areas in the concentrated waste tank rooms #1 and #2 existed through fiberglass gratings which were not equipped with a control device, alarm, or lock. Access to the #1 tank room was controlled by a single bolt securing the grating.

This is a Severity Level IV Violation (Supplement IV)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

Shield plugs on openings above the concentrated waste tanks (CWT) and a resin tank were removed in order to solidify and remove concentrated wastes from the CWTs. The openings are located on the roof of the concrete vault which houses the tanks. Following solidification and disposal of the liquid concentrated wastes, a system was set up to transfer the residual sludge from #2 CWT to #1 CWT.

The transfer system included hoses which were placed in the tanks through the vault opening. The opening was used only for such hoses during the transfer operation and at no time did personnel enter the vault. As a fixed barrier to unauthorized entrance, grating was installed around the hoses and bolted across the opening. The grating was not locked or alarmed since it was intended to be a fixed barrier and not an entrance to the vaults. Signs were posted on the grating to identify the vaults as high radiation areas.

On May 20, 1985, it was discovered that the bolt for the grating over one of the tanks was missing. Apparently due to an oversight it had not been replaced by maintenance personnel who had performed work on the sludge transfer system. After discovery, a high radiation area was established around the entire Radwaste Treatment Facility roof with the entrance to the area locked. This barrier, which was posted as a high radiation area, enclosed the openings for the resin disposal tank and both CWTs.

Following completion of the waste solidification effort and transfer of the sludge from CWT #2 to CWT #1, the shield plugs were reinstalled in the openings and on June 14, 1985 the high radiation area disestablished.

Requirements concerning access to high radiation areas were reviewed with maintenance personnel.

CORRECTIVE STEPS WHICH WILL BE TAKEN

The HBPP program for control of high radiation areas is under revision. The new program will require the review of the Plant Staff Review Committee before a Temporary High Radiation Area may be converted to a Permanent High Radiation Area. This review will provide added assurance that access points to Permanent High Radiation Areas will comply with the requirements of 10 CFR 20.203(c)(2).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

A locked boundary was established on May 24, 1985.

C. DOCUMENTATION OF SURVEYS

STATEMENT OF VIOLATION

"10 CFR 20.401, 'Records of Surveys' states in part that each

licensee shall maintain records showing the results of surveys required by 10 CFR 20.201(b). 10 CFR 20.201(b) states in part that each licensee shall make such survey as may be necessary to comply with the regulations in this part.

Contrary to the above, on or about May 10, 1985, a survey was made in and around a large radioactive waste container and shield ring as necessary to comply with 10 CFR 20.201 and as of May 16, 1985, no licensee record had been created to document the results of this survey. The survey was necessary to establish posting and labeling requirements for this area. When this matter was brought to the licensee's attention, at the exit interview, the inspector was informed that the radiation protection monitor made notes but failed to document the survey.

This is a Severity Level V Violation (Supplement IV)."

EXPLANATION AND CORRECTIVE STEPS TAKEN

When the container of solidified radioactive waste was placed inside the shield ring, a survey was performed. The dose rate was written on a high radiation area sign and the sign was posted on the side of the shield ring. It has been normal plant practice for the technician to document the survey on hand drawn maps and then transcribe the results to another map at a later time. Since the second map is prepared in the office, the technician can use drafting aids such as templates and scales to make a more informative and readable map.

As noted by the inspector in the inspection report, the survey described in the notice of violation was performed. The results were posted on the bulletin board in the Radiation Protection Department office. Therefore, the results of the survey were in fact available in that office. However, due to other work requirements, the technician had not transferred the information from the hand drawn map to the formal survey map as of May 16, 1985.

Following the inspection, the survey results were transferred to another survey map which was filed in the plant survey records. All technicians were instructed to transfer survey information to the final survey maps as soon as possible after completing a survey.

CORRECTIVE STEPS WHICH WILL BE TAKEN

PGandE believes the corrective actions described above are adequate to address the violation. Therefore, no additional corrective steps are necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.