



231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201-2046

(414) 221 2345

VPNPD-96-093

November 12, 1996

Document Control Desk
US NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-266/96009(DRP); 50-301/96009(DRP)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated October 18, 1996, the NRC forwarded to Wisconsin Electric Power Company NRC Radiation Protection Inspection Report Nos. 50-266/96009(DRP); 50-301/96006(DRP). The reports forwarded the results of inspections concluded on September 25, 1996, of selected radiation protection activities at the Point Beach Nuclear Plant. Enclosed with the inspection reports was a Notice of Violation documenting a violation of requirements for control of high radiation areas.

Pursuant to the requirement of 10 CFR 2.201, we are responding to this violation. Attached is our response which includes: (1) the reason for violation, or if contested, the basis for disputing the violation; (2) the corrective action taken and the results achieved; (3) corrective action to be taken to avoid further violations; and (4) the date when full compliance will be achieved.

As requested in the letter transmitting the inspection and related Notice, we have included a discussion of our plans to improve the overall control of high radiation areas at the Point Beach Nuclear Plant in our response to the Notice. We believe this is responsive to the Notice and your concerns. Please contact us if you have any questions or desire additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Bob Link', with the word 'for' written below it.

Bob Link
Vice President
Nuclear Power

TGM

Attachment

cc: NRC Regional Administrator
NRC Resident Inspector

9611220292 961112
PDR 4DOCK 05000266
G PDR

IEDI 1/1

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION

INSPECTION REPORT NOS. 50-266/96009(DRP); 50-301/96009(DRP)

WISCONSIN ELECTRIC POWER COMPANY

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKETS 50-266 AND 50-301

LICENSE NOS. DPR-24 AND DPR-27

During a routine radiation protection inspection performed by Messrs. R. Paul and K. Lambert of your staff and completed on September 25, 1996, one violation of NRC requirements was identified. The violation was classified as Severity Level IV. Inspection Report Nos. 50-266/96009(DRP); 50-301/96009(DRP) and the Notice of Violation (Notice) transmitted to Wisconsin Electric on October 18, 1996, provide the details regarding the violation.

In accordance with the instructions provided in the Notice, our reply to the violation includes: (1) the reason for violation, or if contested, the basis for disputing the violation; (2) the corrective action taken and the results achieved; (3) corrective action to be taken to avoid further violations; and (4) the date when full compliance will be achieved.

As requested in the letter transmitting the inspection and related Notice, we have included a discussion of our plans to improve the overall control of high radiation areas at the Point Beach Nuclear Plant in our response to the Notice.

VIOLATION:

Technical Specification 15.6.11, requires that radiological control procedures shall be written and made available to all station personnel, and shall state permissible radiation exposure levels. The radiation protection program shall meet the requirements of 10 CFR 20.

Health Physics Procedure No. 4.2.20, "Radiation Work Permit," requires that a Radiation Work Permit (RWP) shall be required for entry into an area posted "High Radiation Area, RWP Required."

Contrary to the above, on April 4, 1996, a worker was present in the "C" CVCS hold up tank cubicle which was posted "High Radiation Area, RWP Required," without being signed on to an RWP.

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

Response to Violation:

The violation, as further discussed in the inspection report is appropriately characterized except for the date of the violation. This particular violation of high radiation area controls at Point Beach occurred on May 2, 1996, as stated in the report. The April 4, 1996, date in the Notice is in error. The April 4, 1996, event was documented in Inspection Report 50-266/96003(DRP); 50-301/96003(DRP) and attached Notice dated June 13, 1996. We responded to that Notice by letter dated July 19, 1996.

On May 2, 1996, a Mechanic Electrician (ME) was cleaning pipes in the Primary Auxiliary Building (PAB) in the "C" CVCS hold up tank cubicle elevation eight feet, in preparation for the installation of freeze seals in support of planned work. A transfer of spent fuel pool demineralizer resin was also scheduled for that day. At approximately 9:30 a.m., Health Physics Technologists (HPT) performed a tour of the areas that could be affected by the transfer. The hold up tank cubicle was not entered. The ME stated that he did not hear anyone ask if the cubicle was occupied, nor did he hear the PA announcement warning of the transfer. At this time, the temporary high radiation area/RWP required postings and barriers were erected.

The transfer commenced at approximately 10:10 am. Shortly thereafter, the ME exited the hold up tank cubicle on the 26 foot elevation (the only access/egress point). The ME proceeded east where it became apparent that he was inside the barrier. The ME proceeded to the other side of the barrier and upon reading the posting which required an RWP due to high radiation, proceeded north of the centrally located demineralizer cubicles where another posting was encountered. The ME realized that he had been inside the barrier without anyone's knowledge. The ME exited the PAB and proceeded directly to the Health Physics station where he reported the incident to the lead HPT.

The ME's self-reading dosimeter (SRD) read zero (0) mR. The HPT noted the time to be 10:20 a.m. Therefore, the worst case occupancy time of the posted area by the ME during the evolution was 10 minutes.

Subsequent dose rates during the resin transfer in the posted area were measured to be less than or equal to 2 mR/hour, general area.

(1) Reason for the Violation:

The primary cause for this violation was the inadequate verification by the HPTs that no unauthorized personnel were in the area prior to posting the area as a High Radiation Area/RWP Required.

(2) Corrective Action Taken:

1. The dose to the affected individual was assessed. No exposure limits were exceeded.
2. The event was discussed with the entire Health Physics group. The need for thorough searches of affected areas was emphasized and is understood.

(3) Corrective action to be taken to avoid further violations:

1. Health Physics procedures are being revised to provide enhanced guidance for verifying the absence of personnel in areas to be posted.
2. Methods used to notify personnel of changing radiological conditions in the RCA are being evaluated and will be updated as necessary.

In addition to the above corrective actions, the Health Physics group has requested an independent review of the health physics program and radiation work practices in general to improve high radiation area controls. High radiation area controls will be assessed on a priority basis early in this review. Corrective action will be taken upon identification of necessary improvements and prior to the Spring 1997, Unit 1, refueling outage. The outage is presently scheduled to commence April 18, 1997.

(4) Date When Full Compliance Will Be Achieved:

Full compliance will be achieved upon implementation of the appropriate recommendations from the independent review. This will occur prior to the Spring 1997, Unit 1 refueling outage.