

APPENDIX A
NOTICE OF VIOLATION

Sacramento Municipal Utility District
P. O. Box 15830
Sacramento, California 95813

License No. DPR-54
Docket No. 50-312

As a result of the inspection conducted during the period of September 23-27, 1985, October 7-15, 1985, and telephone discussions of October 18, 21, 22, 23 and 24, 1985, and in accordance with NRC Enforcement Policy 10 CFR, Part 2, Appendix C, the following violations were identified.

- A. Technical Specifications, Section 6.11, "Radiation Protection Program" states in part: "Procedures for personnel 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 radiation exposure." The following procedures established pursuant to Technical Specifications, Section 6.11 state in part:
- 1) "That workers are responsible for obeying posted, oral, and written radiation protection instructions and procedures, including instructions on RWPs (Procedure AP-305, Article 2, "Responsibility of Workers").
 - 2) "It is the responsibility of all personnel utilizing an RWP to familiarize themselves with the radiological conditions listed, protective clothing and dosimetry required, and any special instructions. Each RWP user will complete his own individual items as Name, Initials, Date, and Badge No. Individual completion of these items constitutes acknowledgement of the conditions and requirements as listed" (Procedure AP-305-4, "Radiation Work Permits, paragraph 3.2.3.5").
 - 3) "A dosimeter must be worn by anyone when entering Controlled Areas if it is required by the RWP" (Procedure AP 305-3, "Direct Reading Pocket Dosimeter Assignment and Use").

Contrary to the above requirement, radiation protection procedures were not to adhered as observed by the inspector on:

- 1) September 25, 1985, when an auxiliary operator did not wear the pocket ionization chamber nor the same protective clothing required by RWP 85-743 while working on the resin transfer solidification pad,
- 2) September 26, 1985, when an utility worker did not wear the protective clothing cloth hood required by RWP 85-743 while working on the resin transfer solidification pad and,
- 3) October 9, 1985, when a security guard did not wear the protective shoe covers required by RWP 85-738 while on the -20 foot level of the auxiliary building.

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

- B. Technical Specifications, Section 4.20, "Radioactive Gaseous Effluent Monitoring Instrumentation," Table 4.20-1 requires Instrument Channel Calibrations of the reactor building purge vent and auxiliary building stack monitors sampler flow rate devices be accomplished bi-yearly (BY). Technical Specifications, Section 1.5.4, "Instrument Channel Calibration" defines a channel calibration as follows:

"An instrument channel calibration is a test, and adjustment (if necessary), to establish that the channel output responds with acceptable range and accuracy to known values of the parameter which the channel measures or an accurate simulation of these values. Calibration shall encompass the entire channel, including equipment actuation, alarm, or trip and shall be deemed to include the channel test."

Contrary to the above, on September 27, 1985, the inspector observed that the reactor building purge vent and auxiliary building stack radioactivity monitoring systems sampler flow rate measurement devices were not calibrated in that the test performed on June 24, 1985 did not quantitatively compare the measured flow rate by the devices to known flow rate values.

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

Pursuant to the provisions of 10 CFR 2.201, Sacramento Municipal Utility District is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation addressing each alleged violation including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Nov. 22, 1985
Dated

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