

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

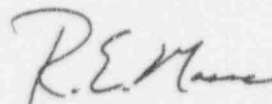
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

South Texas Project
Unit 2
Docket Nos. STN: 50-499
Reply to Notice of Violation 9710-01

South Texas Project has reviewed Notice of Violation 9710-01, dated March 20, 1997, regarding an inadequate procedure, and submits the attached reply. The event described in the Notice of Violation did not have an adverse effect on the health and safety of the public.

If there are any questions regarding this reply, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7988.



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MKJ/

Attachment: Reply to Notice of Violation 9710-01

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Reply to Notice of Violation 9710-01

I. Statement of Violation:

- A. Technical Specification 6.11.1 states that 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 personnel radiation exposure.

10 CFR 20.1501 (a) states, in part, "...that each licensee shall make or cause to be made, surveys that.... (2) Are reasonable under the circumstances to evaluate (i) The extent of radiation levels; and (ii) concentrations or quantities of radioactive material; and (iii) The potential radiological hazards that could be present."

Section 4.5.3 of radiation protection procedure OPRP07-ZR-0010, Revision 4, "Radiation Work Permits," requires a radiological survey prior to the start of work, if radiological survey data is more than 7 days old.

Section 4.5.3 of Radiation Protection Procedure OPRP07-ZR-0010, Revision 3, "Radiation Survey Program," states, in part, "Determination of airborne radioactivity levels shall be performed... when the potential exists for air concentration to exceed 0.25 DAC."

Contrary to the above, on February 11, 1997, contamination surveys were not performed to determine the concentration or quantities of radioactive material inside the primary side of the steam generators prior to the start of work and the existing survey data were more than 7 days old. Also, on February 11, 1997, air sampling was not performed during the installation of nozzle dams inside the primary side of the steam generators, when the potential existed to exceed 0.25 derived air concentration.

This is a Severity Level IV violation (Supplement IV) (50-498/9710-01; 50-499/9710-01).

II. South Texas Project Position:

South Texas Project concurs that the violations occurred.

III. Reason for Violations:

The reason for the violations was an inadequate procedure. A contributing cause was an inadequate guideline for steam generator radiological coverage.

Based on measurements obtained from previous outages and experience, it was known that the contamination levels were expected to be several hundred mrad/h smearable contamination and airborne activity could exceed one derived air concentration (DAC). Utilizing this information the protective equipment prescribed by the Radiation Work Permit for the installers protected them from any credible air concentration and loose surface contamination. Since it was believed all credible practices had been taken the individuals involved failed to recognize procedural requirements were applicable for the work to be performed. As a result, contamination and airborne radioactivity measurements were not performed prior to nozzle dam installation as required by procedure.

The procedures entitled Radiological Survey Program and Radiation Work Permits provide guidance for when measurements are to be taken. Specific requirements for steam generator activities are provided in procedure entitled Performance of High Exposure Work.

The procedure for Performance of High Exposure Work, contains an in-hand checklist for steam generator work. This checklist did not address all requirements of the Radiological Survey Program and Radiation Work Permits procedures regarding radiation measurements.

IV. Corrective Actions:

1. Following identification of this issue, measurements of airborne radioactivity and surface contamination were performed during the next entry into the steam generator bowls for removal of nozzle dams. Results were consistent with measurements obtained from previous outages.
2. The procedure for Performance of High Exposure Work will be enhanced to ensure specific requirements are captured as stated in procedures entitled Radiological Survey Program and the Radiation Work Permits. This action will be completed by May 15, 1997.

V. Date of Full Compliance:

South Texas Project is in full compliance.