

# UNITED STATES NUCLEAR REGULATORY COMMISSION

#### REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

December 20, 2002

Mr. C. L. Terry, Senior Vice President and Principal Nuclear Officer TXU Energy ATTN: Regulatory Affairs Comanche Peak Steam Electric Station P.O. Box 1002 Glen Rose, Texas 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION - NRC RADIATION SAFETY

TEAM INSPECTION REPORT 50-445/02-10; 50-446/02-10

Dear Mr. Terry:

On December 13, 2002, the NRC completed a radiation safety team inspection at your Comanche Peak Steam Electric Station, Units 1 and 2, facility. The enclosed report documents the inspection findings that were discussed with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your operating license. The team reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, the team evaluated the inspectable areas within the Radiation Protection Strategic Performance Area that are scheduled for review every two years. These areas are:

- Radiation Monitoring Instrumentation
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems
- Radioactive Material Processing and Transportation
- Radiological Environmental Monitoring Program and Radioactive Material Control Program

This report documents two self-revealing findings of very low significance (Green), which were determined to involve violations of NRC requirements. However, because of their very low safety significance and because they are entered into your corrective action program, the NRC is treating the findings as non-cited violations consistent with Section VI.A of the NRC Enforcement Policy. If you contest these non-cited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington DC 20555-0001; and the NRC Resident Inspector at the Comanche Peak Steam Electric Station.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's

document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

//RA//

Troy W. Pruett, Chief Plant Support Branch Division of Reactor Safety

Dockets: 50-445

50-446

Licenses: NPF-87

NPF-89

Enclosure:

NRC Inspection Report 50-445/02-10; 50-446/02-10

cc w/enclosure: Roger D. Walker Regulatory Affairs Manager TXU Generation Company LP P.O. Box 1002 Glen Rose, Texas 76043

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TXU Energy -4-

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Scott Morris (SAM1)
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# R: \_CP\CP2002-10RP-TEAM-MPS.WPD

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MPShannon:jlh	JBNicholas	BDBaca	DRCarter	WDJohnson
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C:PSB				
TWPruett				
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12/20/02				

## **ENCLOSURE**

## U.S. NUCLEAR REGULATORY COMMISSION

## **REGION IV**

Dockets: 50-445, 50-446

Licenses: NPF-87, NPF-89

Report: 50-445,446/2002-10

Licensee: TXU Generation Company LP

Facility: Comanche Peak Steam Electric Station, Units 1 and 2

Location: FM-56, Glen Rose, Texas

Dates: December 9 -13, 2002

Inspectors: Michael P. Shannon, Senior Health Physicist - Team Leader

J. Blair Nicholas, Senior Health Physicist Bernadette D. Baca, Health Physicist Daniel R. Carter, Health Physicist

Approved by: Troy W. Pruett, Chief, Plant Support Branch

Division of Reactor Safety

Attachment: Supplemental Information

#### SUMMARY OF FINDINGS

Comanche Peak Steam Electric Station, Units 1 and 2 NRC Inspection Report 50-445/02-10; 50-446/02-10

IR 05000445-2002-10; IR 05000446-2002-10; TXU Energy; on 12/09/2002-12/13/2002; Comanche Peak Steam Electric Station; Units 1 and 2. Regional Report. Radiation Safety Team Inspection.

The inspection was conducted by a team of four region-based inspectors. Based on the results of the inspection, two self-revealing findings of very low safety significance (Green) were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using IMC 0609, "Significance Determination Process," (SDP). Findings for which the SDP does not apply may be "Green" or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

# A. <u>Inspector Identified and Self-Revealing Findings</u>

Cornerstone: Public Radiation Safety

1. Green. A self-revealing non-cited violation of 49 CFR 173.421 was identified because the licensee failed to properly classify a shipment package as Surface Contaminated Object (SCO)-II, Schedule 8. On May 1, 2002, box number 300125 included in Radioactive Material Shipment 2002-0039 was classified by the licensee as limited quantity based on a maximum exterior surface dose rate of 0.4 millirem per hour measured prior to shipment. However, on May 9, 2002, receipt surveys performed by Westinghouse personnel showed that the maximum dose rate on the exterior surface of the box was 2.4 millirem per hour, which exceeded the 0.5 millirem per hour limit for a limited quantity package. The team determined that this issue was self-revealing rather than licensee identified because the issue was identified during receipt surveys by the recipient of the radioactive materials shipment.

The failure to properly classify box number 300125 as SCO-II was a performance deficiency. The finding was determined to be more than minor because it was associated with one of the Public Radiation Safety cornerstone attributes (Transportation Program) and affected the associated cornerstone objective. Using the Public Radiation Safety Significance Determination Process, the team determined the finding had very low safety significance because radiation limits for SCO-II were not exceeded, the package was not breached during transit, no certificate-of-compliance problem was involved, there was no low level burial ground nonconformance, and the licensee did not fail to make notifications. This violation is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Smart Form SMF-2002-001873 (Section 2PS2).

2. Green. A self-revealing non-cited violation of Technical Specification 5.4.1a was identified because the licensee did not prevent the release of detectable licensed radioactive material from the radiologically controlled area. Specifically, Procedure

RPI-213, "Survey and Release of Material and Personnel," Revision 8, Section 4.2.1, states, in part, the criteria for unconditional release from a Radiologically Controlled Area is no detectable activity. However, on November 12, 2002, a contract worker was discovered with radioactive material on his lanyard during an in-processing whole body count at another licensee's facility. The individual last worked at Comanche Peak Steam Electric Station. The team determined that this example was self-revealing rather than licensee identified because the example was found by another licensee.

The failure to properly control detectable licensed radioactive material is a performance deficiency. The finding was more than minor because it was associated with one of the Public Radiation Safety cornerstone attributes (Material Release Program) and affected the associated cornerstone objective. Using the Public Radiation Safety Significance Determination Process, the team determined the finding had very low safety significance because there were not more than 5 occurrences and the exposure associated with each item was less than 5 millirem. This violation is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Smart Form SMF-2002-3975 (Section 2PS3).

## B. Licensee Identified Violations

A violation of very low safety significance (Green) which was identified by the licensee was reviewed by the team. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. This violation and the corrective action tracking number are listed in Section 4OA7 of this report.

## Report Details

# 2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety [OS]

2OS3 Radiation Monitoring Instrumentation (71121.03)

#### a. Inspection Scope

To determine the accuracy and operability of radiation monitoring instruments used for the protection of occupational workers and the adequacy of the program to provide self-contained breathing apparatus to personnel entering unknown atmospheres, the team interviewed cognizant licensee personnel and compared the following items with regulatory requirements:

- Calibration, operability, and alarm setpoint, when applicable, of selected portable radiation detection instrumentation, area radiation monitors (Unit 2: Containment In-core and High Range, Control Room Ventilation, Failed Fuel, and Fuel Building), continuous air monitors, whole-body counting equipment, electronic alarming dosimeters, portal and personnel contamination monitors
- Calibration expiration and source response check currency on radiation detection instruments staged for use
- The status of self-contained breathing apparatuses staged and ready for use in the plant and associated surveillance records
- The licensee's capability for refilling and transporting self-contained breathing apparatus air bottles to and from the control room and operations support center during emergency conditions
- Self-contained breathing apparatus air quality checks
- Training and qualifications of control room operators and emergency response personnel for use of self-contained breathing apparatus and change-out of bottles
- 2001 Radiation Protection Department Self-Assessment SA-2001-003
- Selected corrective action documents that involved radiation monitoring instrumentation and self-contained breathing apparatus programs

#### b. Findings

While observing the calibration of portal monitor number one located in the Primary Access Point, using calibration Procedure RPI-886, "Calibration of the Eberline PM-7 Personnel Monitor," Revision 0, the team noted that the procedure was not written in accordance with the vendor's technical manual recommendations. For example, the vendor manual recommended placing a calibration source 3 inches away from the

center line of the head and side detectors and on contact with the center of the foot detector to determine detector efficiencies. It also stated that when using a Cesium-137 source the detector efficiencies for the following detectors should be about: 6 percent for the head detector, 7 percent for each of the four side detectors, and 9-11 percent for the foot detector. Attachment 8.1.1 of the above procedure stated, in part, to position the calibration source in the middle of the portal monitor to determine the efficiencies of the side detectors. Additionally, although the step for placing the calibration source used to obtain the efficiencies of the head detector was not defined in the procedure and not clearly defined for the source placement of the foot detector, the technician placed the source approximately 14 inches away from the detectors using a poorly visible operator aid on the monitor (scratched paint marks).

The team observed the technician place the source in the center horizontally but not in the center vertically. When the team questioned the lack of procedural guidance for positioning the source for the head and foot detectors, the technician explained that he was following the method taught to him by other qualified technicians. Following the placement of the calibration source the technician initiated a calibration computer program run to determine the detector efficiencies. The team noted that the detector efficiencies ranged from 1.0 to 1.4 percent, which were below the vendor recommendations.

The licensee's staff believed that their method of calibrating and determining detector efficiencies of the portal monitors was equivalent to the vendor's recommended technical manual method. The licensee stated that they will perform an evaluation of their procedure to ensure that it is equivalent or more conservative than the vendor's method.

Technical Specification 5.4.1 requires procedures for personnel monitoring. Procedure RPI-886, is used to calibrate equipment for personnel monitoring. Therefore, if the portal monitor calibrations/efficiencies are determined to be non-conservative the monitors could not accurately monitor personnel. The failure to determine portal monitor calibrations/efficiencies correctly would be a Technical Specification violation. This issue is considered an Unresolved Item pending a review, by the NRC of the licensee's evaluation of the portal monitor process (50-445; 446/0210-01). The licensee initiated Smart Form SMF 2002-4278 to capture this issue in the station's corrective action program.

## Cornerstone: Public Radiation Safety [PS]

2PS1 Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems (71122.01)

## a. <u>Inspection Scope</u>

The team interviewed cognizant personnel and walked down the major components of the gaseous and liquid release systems to observe ongoing activities, equipment material condition, and system configuration, as compared to the description in the Updated Final Safety Analysis Report. The team reviewed and compared the following items with regulatory requirements to determine whether the licensee had ensured adequate protection of public health and safety from exposure to radioactive material released into the public domain:

- 2000 and 2001 Radiological Effluent Release Reports
- Changes to the Offsite Dose Calculation Manual and to the radioactive waste system design and operation
- Anomalous results and unplanned releases reported in the Radiological Effluent Release Reports
- 2000 and 2001 radiochemistry quality control program results
- Sample collection and analysis of gaseous and liquid effluents (Primary Effluent Tank-1 and Unit-1 Containment Vent)
- Selected radioactive liquid and gaseous waste releases with associated projected doses to members of the public
- Compensatory sampling and radiological analyses conducted when effluent monitors were declared out of service
- Monthly, quarterly, and annual dose calculations
- Surveillance test results for air cleaning systems and plant stack and vent flow rates
- Records of instrument calibrations performed since the last inspection for Unit 2: containment ventilation monitor (2-RE-5566) and Nitrogen-16 main steam line #1 monitor (2-RE-2325A), north ventilation stack monitor (X-RE-5567B), waste liquid effluent monitor (X-RE-5253), and flow measurement devices
- Effluent radiation monitor alarm set point values
- Calibration records of counting room instrumentation associated with effluent monitoring and release activities
- Quality control records for the counting room instruments
- Nuclear Overview Department Radiological Effluent and Environmental Evaluations (EVAL-2000-029, EVAL-2001-011, and EVAL-2002-021) related to the radioactive effluent treatment and monitoring program
- Selected corrective action documents related to the radioactive effluent treatment and monitoring programs

# b. <u>Findings</u>

No findings of significance were identified.

#### 2PS2 Radioactive Material Processing and Transportation (71122.02)

# a. <u>Inspection Scope</u>

The team interviewed licensee personnel involved in radioactive material and waste processing and transportation activities, walked down liquid and solid radioactive waste processing systems to verify that the current system configurations and operation agreed with the descriptions contained in the Updated Final Safety Analysis Report and Process Control Program. The team observed the licensee prepare a shipment to a waste processor (Shipment 2002-098). Additionally, the team reviewed the following items, to determine if the licensee is meeting the objective of this cornerstone which is to ensure adequate protection of public health and safety from exposure to radioactive material released into the public domain from routine operations.

- Radioactive material/waste processing and shipping procedures
- Status of radioactive waste process equipment that was not operational and/or abandoned in place
- Adequacy of any changes made to the radioactive waste processing systems since the last inspection in June 2000
- Waste stream mixing and/or sampling procedures, methodology for waste concentration averaging, and waste classification procedures
- Radio-chemical sample analysis results for each identified radioactive waste stream
- Scaling factors and calculations used to account for difficult-to-measure radionuclides
- Changes in waste stream composition due to changing operational parameters and analysis updates
- 10 CFR Part 20, Appendix G, Quality Assurance Program
- Documentation for 12 non-excepted package shipments that demonstrated shipment packaging, surveying, labeling, marking, placarding, vehicle checks, emergency instructions, disposal manifest, shipping papers provided to the driver, and licensee verification of shipment readiness
- Transport cask Certificates of Compliance and cask loading and closure procedures for the following shipping casks: 14-215, 8-120B and 10-160B

- Transferee's licenses and state/DOT permits
- Conduct of radioactive waste processing and radioactive material shipment preparation activities
- Training of personnel responsible for the conduct of radioactive material/waste processing and shipment preparation activities
- Special 30 Day Report 10 CFR 71.95(c), "Instances in Which Conditions of Approval in the Certificate-of-Compliance were not Observed in Making a Shipment," September 4, 2001
- Nuclear Overview Department Evaluation Report EVAL-2002-001
- Radiation Protection Department Self-Assessment SA-2002-008
- Selected corrective action documents related to the radioactive material/waste and shipping programs

## b. <u>Findings</u>

A self-revealing non-cited violation of very low safety significance (Green) was identified for the failure to comply with Department of Transportation (DOT) regulations.

During the review of corrective action documents pertaining to a shipment of radioactive materials the team noted that, on May 1, 2002, the licensee shipped a box filled with radioactive outage equipment to the Westinghouse Waltz Mill facility. Shipment 2002-0039 consisted of a mixture of several packages, some of which were classified Limited Quantity and some Surface Contaminated Object (SCO)-II. Box number 300125 was classified for shipment as Limited Quantity based on a maximum exterior surface dose rate of 0.4 millirem per hour measured by the licensee prior to shipment. Upon arrival, receipt surveys performed by Westinghouse personnel showed that the maximum dose rate on the exterior surface of box number 300125 was 2.4 millirem per hour which exceeded the 0.5 millirem per hour limit for a Limited Quantity package, as specified in DOT regulations. Therefore, box number 300125 was under classified based on an inadequate radiation survey performed prior to shipment and should have been shipped as SCO-II, Schedule 8, which has a maximum radiation dose rate limit of 200 millirem per hour. The team determined that this issue was self-revealing rather than licensee identified because the issue was identified during receipt surveys by the recipient of the shipment.

The team determined that the failure to properly classify box number 300125 as SCO-II was a performance deficiency. The finding was determined to be more than minor because it was associated with one of the Public Radiation Safety cornerstone attributes (Transportation Program) and affected the associated cornerstone objective. Using the Public Radiation Safety Significance Determination Process, the team determined the finding had very low safety significance (Green) because radiation limits for SCO-II were not exceeded, the package was not breached during transit, no certificate-of-compliance

problem was involved, there was no low level burial ground nonconformance, and the licensee did not fail to make notifications.

10 CFR 71.5 requires, in part, that each licensee who transports licensed materials offsite shall comply with the requirements of the DOT regulations in 49 CFR Parts 170 through 189. Paragraph (a)(2) of 49 CFR 173.421 states, in part, the radiation level at any point on the external surface of a package classified as excepted packages for limited quantities can not exceed 0.5 millirem per hour. This violation is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Smart Form SMF-2002-1873 (NCV 50-445; 446/0210-02).

# 2PS3 Radiological Environmental Monitoring Program and Radioactive Material Control Program (71122.03)

#### a. Inspection Scope

The team interviewed members of the licensee's staff responsible for implementing the radiological environmental, meteorological monitoring, and radioactive material control programs. The team observed the following activities and equipment:

- Collection and preparation of airborne particulate and charcoal samples for analysis
- Meteorological instrumentation at the primary and back-up meteorological towers and data displays in the control room
- Survey of materials for release from the radiologically controlled area

The following items were reviewed and compared with regulatory requirements to determine whether the licensee had an adequate program to verify the impact of radioactive effluent releases to the environment and to ensure that the licensee's surveys and controls were adequate to prevent the inadvertent release of licensed materials into the public domain:

- Implementing procedures for the radiological environmental monitoring program
- Environmental sample analytical results
- Eight environmental air sampling stations (A1 through A8), four surface water sampling stations (SW1, SW2, SW5, and SW6), two drinking water sampling stations (SW2 and SW6), two broadleaf vegetation sampling stations (BL1 and BL3), and 14 thermoluminescent dosimetry (TLD) stations (R1, R2, R4, R12, R13, R22, R24, R28, R29, R30, R31, R32, R35, and R36)
- Calibration and maintenance records for the environmental air sampling and meteorological equipment

- 2000 and 2001 land use census results and changes to the radiological environmental monitoring program
- 2000 and 2001 Annual Environmental Operating Reports
- The 2001 and January-June 2002 environmental laboratory's performance in the interlaboratory comparison program
- Implementing procedures for the meteorological monitoring program
- Meteorological instrument operability, reliability, and annual meteorological data recovery
- Procedures, methods, and instruments used to survey, control, and release materials from the radiologically controlled area
- Detection sensitivities of radiation survey instruments used for the release of potentially contaminated materials from the radiologically controlled area
- Criteria used for the unrestricted release of potentially contaminated material from the radiologically controlled area
- Nuclear Overview Department Radiological Effluent and Environmental Evaluations (EVAL-2000-029, EVAL-2001-011, and EVAL-2002-021)
- Vendor NUPIC Audit Number 17944 and vendor assessment VL-01-001104 (CPSES 200102224) pertaining to meteorological instrumentation
- Selected corrective action documents related to the radiological environmental monitoring, meteorological monitoring, and release of radioactive material programs

# b. <u>Findings</u>

A self-revealing non-cited violation of very low safety significance was identified because the licensee did not control licensed radioactive material in accordance with Technical Specifications.

During the review of corrective action documents pertaining to the control of radioactive material the team noted that, on November 12, 2002, a contract worker's lanyard with contamination levels as high as 13,000 disintegrations per minute was found outside the radiologically controlled area during an in-processing whole body count at another facility. The team determined that this example was self-revealing rather than licensee identified because the example was found by another licensee. (The licensee identified an additional example in which detectable licensed radioactive material was not properly controlled. This example is discussed in Section 4OA7.)

The team determined that the failure to control detectable licensed radioactive material was a performance deficiency. The finding was more than minor because it was associated with one of the Public Radiation Safety cornerstone attributes (Material Release Program) and affected the associated cornerstone objective. Using the Public Radiation Safety Significance Determination Process, the team determined the finding had very low safety significance because there were not more than 5 occurrences and the exposure associated with each item was less than 5 millirem.

Technical Specification 5.4.1.a requires written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 7 references procedures for control of radioactivity. Procedure RPI-213, "Survey and Release of Material and Personnel," Revision 8, Section 4.2.1, states, in part, that the criteria for unconditional release from a Radiologically Controlled Area is no detectable activity. This violation is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Smart Form SMF-2002-3975 (NCV 50-445; 446/0210-03).

#### 4. OTHER ACTIVITIES

## 4OA6 Meetings

# **Exit Meeting Summary**

The team presented the inspection results to Mr. L. Terry, Senior Vice President and Principal Nuclear Officer, and other members of licensee management during an exit meeting conducted on December 13, 2002. The licensee acknowledged the findings presented.

The team asked the licensee whether or not any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

## 4OA7 Licensee Identified Violations

The following violation of very low safety significance was identified by the licensee and is a violation of NRC requirements which meets the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a non-cited violation.

Technical Specification 5.4.1.a requires written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 7 references procedures for control of radioactivity. Procedure RPI-213, "Survey and Release of Material and Personnel," Revision 8, Section 4.2.1, states, in part, that the criteria for unconditional release from a Radiologically Controlled Area is no detectable activity. On December 6, 2002, the licensee identified an example in which detectable licensee radioactivity was found outside the radiologically controlled area, as described in the licensee's corrective action program Smart Form SMF 2002-4229. Because there were

not more than 5 occurrences and the exposure associated with the item was less than 5 millirem, this violation is not more than of very low significance, and is being treated as a non-cited violation.

#### **ATTACHMENT**

#### SUPPLEMENTAL INFORMATION

#### PARTIAL LIST OF PERSONS CONTACTED

#### Licensee

- M. Blevins, Vice-President and Deputy to Senior Vice-President
- S. Bradley, Supervisor, Radiation Protection
- J. Curtis, Manager, Radiation Protection
- E. Floyd, Technician, Radiation Protection
- D. Kay, Supervisor, Radiation Protection
- J. Keeling, System Engineer, Engineering
- R. Knapp, Supervisor, Radiation Protection
- B. Knowles, Supervisor, Radiation Protection
- M. Macho, Engineer, Radiation Protection
- D. Moore, Plant Manager
- D. O'Connor, Supervisor, Radiation Protection
- L. Terry, Senior Vice-President and Principal Nuclear Officer
- D. Wilder, Manager, Radiation and Industrial Safety
- C. Wilkerson, Senior Engineer, Licensing
- S. Willis, Engineer, Industrial Safety

#### **NRC**

- D. Allen, Senior Resident Inspector
- A. Sanchez, Resident Inspector

## ITEMS OPENED, CLOSED, AND DISCUSSED

#### Opened

50-445;446/0210-01 URI Possible non-conservative calibration/efficiency determination of radiation portal monitor detectors (Section 2OS3).

## Opened and Closed During this Inspection

50-445;446/0210-02 NCV Failure to properly classify a radioactive material shipment package as Surface Contaminated Object-II (Section 2PS2)

50-445;446/0210-03 NCV Failure to control detectable licensed radioactive material (Section 2PS3).

#### **Previous Items Closed**

None

#### LIST OF DOCUMENTS REVIEWED

#### IP 71121.03

#### Instrumentation

Smart Forms: 2001-2513, 2002-0097, 2002-0147, 2002-0369, 2002-0454, 2002-0620, 2002-0777, 2002-1218, 2002-1500, 2002-1633, 2002-1738, 2002-1755, 2002-1841, 2002-2107, 2002-2242, 2002-2261, 2002-2700, 2002-2739, 2002-2794, 2002-2828, 2002-2945, 2002-3079, and 2002-3398

#### SCBA

Smart Forms: 2000-1739, 2000-1911, 2001-0509, and 2002-2656

## IP 71122.01

#### **Effluents**

Smart Forms: 2000-3174, 2001-0022, 2001-0730, 2001-2761, 2002-0005, 2002-0021, 2002-1165, 2002-1906, 2002-2430, 2002-2934, and 2002-4241

#### IP 71122.02

#### Solid Waste and Transportation

Smart Forms: 2000-0740, 2000-0329, 2000-0637, 2000-0838, 2000-1734, 2000-2555, 2000-2947, 2001-1861, 2001-2669, 2001-2948, 2002-0742, 2002-1167, 2002-1247, 2002-1660, 2002-1873, 2002-2443, and 2002-2824

#### IP 71122.03

## Radiological Environmental Monitoring Program

Smart Forms: 2001-1189, 2001-1299, 2002-2115, 2002-2484, and 2002-3567

#### Release of Radioactive Material

Smart Forms: 2002-1639, 2002-1653, 2002-1655, 2002-1689, 2002-1827, and 2002-3400

#### Meteorological Monitoring

Smart Forms: 2000-1393, 2000-1667, 2001-0459, 2001-1327, 2001-2638, 2001-2923, 2001-2965, 2002-0648, 2002-1297, 2002-1385, 2002-1785, 2002-1911, 2002-2702, and 2002-3039