September 26, 2001

Mr. Theodore Sullivan
Vice President - Operations
Entergy Nuclear Northeast
James A. FitzPatrick Nuclear Power Plant
Post Office Box 110
Lycoming, NY 13093

SUBJECT: FITZPATRICK - NRC INSPECTION REPORT 50-333/01-07

Dear Mr. Sullivan:

On August 18, 2001, the NRC completed an inspection at the James A. FitzPatrick Nuclear Power Plant. The enclosed report documents the inspection findings which were discussed on September 6, 3002, with you and 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 license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

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 http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room). Should you have any questions regarding this report, please contact me at 610-337-5211.

Sincerely,

/RA/

Glenn W. Meyer, Chief Projects Branch 3 Division of Reactor Projects

Docket No. 50-333 License No.: DPR-59

Enclosure: Inspection Report 50-333/01-07
Attachment: Supplemental Information

cc w/encl: J. Yelverton, CEO, Entergy Operations

M. Colomb, General Manager, Entergy Nuclear Operations

J. Knubel, VP Operations Support R. Patch, Acting Director of Oversight

A. Halliday, Licensing Manager

M. Kansler, Chief Operating Officer, Entergy

D. Pace, VP Engineering

J. Fulton, Assistant General Counsel

Supervisor, Town of Scriba

J. Tierney, Oswego County Administrator

C. Donaldson, Esquire, Assistant Attorney General, New York Dept. of Law

P. Eddy, Electric Division, Department of Public Service, State of New York

W. Flynn, President, New York State Energy Research

and Development Authority

T. Judson, Central NY Citizens Awareness Network

Dist w/encl: Region I Docket Room (with concurrences)

R. Rasmussen, DRP - NRC Resident Inspector

H. Miller, RA
J. Wiggins, DRA
G. Meyer, DRP
R. Barkley, DRP
T. Haverkamp, DRP

D. Loveless, RI EDO Coordinator

E. Adensam, NRR G. Vissing, PM, NRR

R. Clark, Backup PM, NRR

T. Frye, NRR C. See, NRR

DOCUMENT NAME: C:\Program Files\Adobe\Acrobat 4.0\PDF Output\Fitz0107.wpd After declaring this document "An Official Agency Record" it **will** be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

<u> </u>		copy man dataseminent concerns in the copy				
OFFICE	RI/DRP	RI/DRP				
NAME	Rbarkley/RSB1	GMeyer/GWM				
DATE	09/26/01	09/26/01				

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No.: 50-333

License No.: DPR-59

Report No.: 50-333/01-07

Licensee: Entergy Nuclear Northeast

Post Office Box 110 Lycoming, NY 13093

Facility: James A. FitzPatrick Nuclear Power Plant

Location: 268 Lake Road

Scriba, New York 13093

Dates: July 1 - August 18, 2001

Inspectors: R. A. Rasmussen, Senior Resident Inspector

R. S. Barkley, Senior Project Engineer S. K. Chaudhary, Reactor Engineer B. J. Fuller, Resident Inspector J. C. Jang, Senior Health Physicist E. C. Knutson, Resident Inspector R. K. Lorson, Senior Resident Inspector

T. A. Moslak, Health Physicist N. S. Perry, Senior Project Engineer C. E. Sisco, Reactor Inspector R. R. Temps, Project Manager

Approved by: G. W. Meyer, Chief

Projects Branch 3

Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000333-01-07, on 07/01 - 08/18/2001; Entergy Nuclear Northeast, James A. FitzPatrick Nuclear Power Plant, resident inspection.

The report covers a seven-week inspection by resident inspectors, baseline specialist inspections of ALARA planning and controls, and radioactive gaseous and liquid effluent treatment and monitoring systems, and a specialist inspection of independent spent fuel storage installation (ISFSI) pre-operational dry run activities. 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 are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at http://www.nrc.gov/NRR/OVERSIGHT/index.html.

A. <u>Inspector Identified Findings</u>

None

B. Licensee Identified Findings

The inspectors reviewed a violation of very low significance which was identified by Entergy. The corrective actions taken or planned by Entergy appeared reasonable. This non-cited violation is described in Section 40A7 of this report.

Report Details

SUMMARY OF PLANT STATUS

The reactor operated at full power for the majority of the inspection period. On August 17 an unplanned power reduction was performed to repair a cooling water line to the A condensate pump.

1. REACTOR SAFETY

Initiating Events, Mitigating Systems, Barrier Integrity [REACTOR - R]

1R01 Adverse Weather

a. Inspection Scope

The inspector reviewed the operating status of plant cooling systems, reviewed the procedural limits and actions associated with elevated lake temperatures, and walked down areas of the plant to assess the effectiveness of ventilation systems. The inspectors also interviewed various operations crews to assure that they were aware of temperature restrictions and required actions.

b. <u>Findings</u>

No findings of significance were identified.

1R04 Equipment Alignments

a. Inspection Scope

The inspectors conducted a complete walkdown of all accessible portions of the containment purge and air dilution system. Documents reviewed that are applicable to the containment purge and air dilution system alignment verification included:

- OP-37, Containment Atmosphere Dilution System
- EP-6, Post Accident Containment Venting and Gas Control
- FM-18A, Drywell Inerting C.A.D. and Purge System flow diagram
- FM-18B, Drywell Inerting C.A.D. Purge and Containment Differential Pressurization System flow diagram

In addition, the inspectors reviewed the applicable sections of the updated final safety analysis report and the individual plant evaluation, the corrective action program backlog, and the system health report.

The inspectors also conducted the following partial equipment alignment walkdowns:

 B emergency service water (ESW) crescent coolers to evaluate the operability of B train while the A train was inoperable for chemical flushing of the west crescent coolers Emergency diesel generators, based on increased risk significance during a planned outage of one of the 115 KV offsite power lines on July 24

During these walkdowns the inspectors verified that significant valves and circuit breakers were in the appropriate position by comparing actual component position and the position described in the applicable operating procedures. The inspectors also performed visual inspections of the material condition of the major system components.

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. <u>Inspection Scope</u>

The inspectors toured several plant areas and observed conditions related to fire protection. Inspectors looked for transient combustible materials; observed the condition of suppression systems, penetration seals, and ventilation system fire dampers; and verified that fire doors were functional. These included:

- Emergency diesel generator (EDG) and EDG switchgear rooms on July 24
- Standby gas treatment room and reactor building trackbay on July 17
- General areas of the reactor building on July 1

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness

a. Inspection Scope

The inspector reviewed JAF's activities to monitor the effectiveness of their maintenance activities and the corrective actions for three selected equipment problems. The equipment problems involved functional failures of the ESW system (risk significant mitigation system) and also unplanned power transients (initiating events) resulting from fouling of the circulating water system, and a failure of a reactor feedwater pump (RFP) mechanical seal.

The inspector interviewed engineering personnel and reviewed applicable documentation including: deviation event reports (DERs), plant deficiency items (PIDs), system performance data (reliability and unavailability), system health reports and corrective action plans. Additionally, the inspector reviewed the DERs and PIDs for the systems associated with each of the selected problems to determine whether the system performance was properly classified per the maintenance rule.

The JAF ESW system (a)(1) ESW plan (JTS-APL-00-011, revision 2) documented fifteen check valve functional failures that occurred between 1998 and 2000. The failures included component supply isolation check valves that failed to open in addition to ESW boundary isolation check valves that failed to close. JAF's planned and completed corrective actions included: flushing and cleaning of the ESW system, reduction of the time period between supply isolation check valve preventive maintenance overhauls and/or inspections, replacement of the boundary isolation check valves (except for the keep fill system isolation check valves) with a stainless steel valve believed to be more reliable, and development of an engineering evaluation to remove the boundary isolation safety function from the keep fill system check valves.

Reactor Feedwater Pump Seal Leakage

The JAF feedwater system (a)(1) action plan (JENG-APL-01-004) documented numerous RFP seal leakage problems that have contributed to the feedwater system exceeding its performance criteria for the unplanned capability loss factor (UCLF). The system engineer contacted the RFP mechanical seal vendor and performed a root cause analysis that attributed the seal problems to inadequate cooling. The RFP (a)(1) action plan identified several corrective actions that had not been completed prior to this inspection including: modification of the RFP seal cooling system and actions to confirm the root cause for the RFP seal problems. The inspector interviewed a system engineering supervisor and determined that interim corrective actions involving periodic monitoring of the RFP seal condition had been implemented.

Circulating Water System Fouling

The inspector reviewed the JTS-APL-00-003 report that documented recent unplanned plant power reductions resulting from circulating water system operational problems. The circulating water (CW) system problems were attributed, in part, to maintenance preventable items involving the performance of the CW screens and screen wash system and the build-up of mussels in the plant intake structure and tunnels. The inspector reviewed a summary of the plant data associated with these power reductions to determine whether the CW system problems exceeded the performance criteria to place the system into an category (a)(1) status. The inspector also reviewed JAF's planned and completed maintenance actions which included: repair of holes in the CW screens, replacement of the screen spray nozzles, performance testing of the spray wash booster pumps and cleaning of the intake structure and tunnel.

b. Findings

1R13 Maintenance Risk Assessment and Emergent Work

a. Inspection Scope

The inspector reviewed Entergy's assessment of plant risk due to the following planned maintenance activities:

- Chemical cleaning and flushing of the A emergency service water system during the week of July 16
- Overhaul activities on the C emergency diesel generator during the week of August 8

The inspectors reviewed the maintenance risk assessments and the evaluation of the core damage impact of the maintenance activities. Entergy concluded that the activities were not risk significant, based on the slight increase in conditional core damage probability for the period that the systems were planned to be out of service. The inspectors also reviewed the Technical Specifications and the Final Safety Analysis Report for requirements concerning the planned activities.

During the maintenance activities the inspectors toured the work areas to assure the scope of work was consistent with the plan, and that no additional systems were impacted by the activities.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. <u>Inspection Scope</u>

The inspectors reviewed the following operability determinations performed to address issues identified with safety significant systems. The inspectors reviewed the Final Safety Analysis Report (FSAR), and as applicable, viewed the discrepant condition.

- Inaccuracies in the drywell sump monitoring system caused by leaking sump system valves
- Reactivity management issues caused by the interface between the EPIC computer system and the 3D-Monicore system

b. Findings

1R17 Permanent Plant Modifications

a. Inspection Scope

The inspector reviewed design change JD-00-125, "RHRSW Strainer Packing Modification," and observed portions of the modification implementation and testing. The inspector verified that the materials utilized in the field were consistent with those evaluated in the modification package, and that the modification implementation would not degrade the performance capability of the system. The inspector also verified that the post modification testing adequately demonstrated system operability.

b. Findings

No findings of significance were identified.

1R19 Post Maintenance Testing

a. Inspection Scope

The inspectors observed and reviewed the post maintenance testing associated with the following:

- Maintenance activities on the C EDG
- Replacement of the outer reactor track bay door seal
- Performance testing following the ESW system flush

The inspectors reviewed technical specifications and the FSAR, and compared the testing requirements to those described by the site's administrative procedure for post maintenance testing. The inspectors verified that the testing met the appropriate test objectives.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. <u>Inspection Scope</u>

The inspectors observed portions of testing and/or reviewed procedures and test results relating to the following surveillance tests:

- ST-2AL, "Residual Heat Removal System Loop A Quarterly Operability Test," performed on July 25
- ST-9BB, "Emergency Diesel Generator (EDG) B and D Monthly Full Load Test," performed on July 24

The inspector reviewed technical specifications and the FSAR, and verified that the testing met appropriate test objectives.

b. <u>Findings</u>

No findings of significance were identified.

E2 Engineering Support of Facilities and Equipment

E2.2 Pre-operational Testing of Independent Spent Fuel Storage Installation (IP60854)

a. <u>Inspection Scope</u>

During July 23-26, 2001, the inspectors observed and evaluated the first of two scheduled dry run demonstrations of independent spent fuel storage installation (ISFSI) operations. The inspection was conducted to verify that Entergy developed, implemented, and was evaluating pre-operational testing activities to safely load spent fuel from the spent fuel pool into a dry cask storage system (DCSS). To complete the inspection, the inspectors observed selected activities, reviewed pertinent documentation, and interviewed station personnel.

The inspectors reviewed the pre-operational test procedures to ensure that requirements specified in the DCSS safety analysis report (SAR), NRC safety evaluation report (SER), or certificate of compliance (C of C), were incorporated as necessary. Specifically, the inspectors reviewed procedure TMP-019.02, Revision 02, "MPC Sealing Demonstration," to verify that parameters such as required helium purity, helium backfill density, hydrostatic test requirements, and vacuum drying requirements were consistent with the C of C requirements. The inspectors also verified that hold and inspection points were clearly identified in the procedures used during this phase of the dry runs. Finally, the inspectors reviewed the welding and non-destructive examination (NDE) procedures for technical adequacy, clarity of requirements, validity of procedure qualification, and conformance to applicable codes.

The inspectors reviewed selected records to verify that the individual performing the helium leak test detection activities was on Entergy's approved vendor list, that the individual's NDT Level III certification was current, and that he had received proper training on ISFSI operations. The inspectors verified that the individual's proficiency was demonstrated during actual operation of the leak testing equipment during the dry run. The inspectors also reviewed certification records of welding and NDE personnel to verify that they were properly qualified.

The inspectors observed selected activities which included multi-purpose canister (MPC) welding operations, MPC sealing operations, and MPC weld removal operations to verify they were performed in accordance with the approved procedures. The inspectors also reviewed relevant training materials and worker qualification records to determine if job performance measures (JPMs) had been completed for tasks to prepare an MPC containing spent fuel for storage. The inspectors attended daily dry cask project planning meetings, ALARA review briefings, and post-task de-briefing sessions to assess management involvement with respect to performance expectations, exposure goals, and lessons-learned. The inspectors' review also included the associated

radiological controls to minimize personnel exposure and contamination during the above activities.

b. <u>Findings</u>

No findings of significance were identified.

2 RADIATION SAFETY

Cornerstone: Occupational Radiation Safety [OS]

2OS2 ALARA Planning and Controls (71121.02)

a. Inspection Scope

During July 9 -13, 2001, the inspector conducted the following activities to determine the effectiveness of administrative, operational, and engineering controls to minimize and equalize personnel exposure for tasks conducted during power operations and for activities performed in a recently completed maintenance outage.

- The inspector reviewed pertinent information regarding cumulative exposure history, current exposure trends, and ongoing activities in order to assess the licensee's effectiveness in establishing exposure goals, and in keeping actual exposure as low as is reasonably achievable (ALARA). Included in this review were ALARA Committee meeting minutes for 2001, and the 2001 Radiation Field Control (Source Reduction) Program report.
- The inspector reviewed the associated exposure controls specified in ALARA Reviews (AR) for selected jobs. The actual cumulative exposure was compared with the estimated exposure and evaluated using the criteria contained in the relevant NRC Significance Determination Process. Jobs that were reviewed included AR 01-028, Replacement of the C-Intermediate Range Monitor, AR 01-018, Replacement of the B-Reactor Water Cleanup Pump, and AR 01-019, Liquid Radwaste Processing.
- Independent radiation surveys were performed in areas of the Turbine Building, Reactor Building, and Waste Processing Building to confirm posted survey results and assess the adequacy of radiation work permits (RWP), ALARA reviews and associated controls. Keys to Technical Specification Locked High Radiation Areas were inventoried and these areas were verified to be properly secured and posted during plant tours.
- Individual exposure records were reviewed for completed tasks and for those currently in progress. Included in this review were the exposure records for a declared pregnant worker, maintenance personnel and radiation protection technicians. Interviews were conducted with the site maintenance manager and a health physics supervisor to assess departmental efforts to minimize and equalize dose to their respective staffs.
- The inspector attended daily radiation protection department staff meetings, a maintenance department daily staff meeting and a site management Plan-of-the-

- Day meeting to assess management involvement in tracking and controlling personnel exposure for jobs in progress.
- On July 10 and 11, 2001, the inspector observed pre-job RWP briefings and the radiological controls implemented for transferring and de-watering phase separator spent resin and waste sludge tank material in preparation for shipment to an off-site disposal facility.
- The effectiveness of various management controls for monitoring and controlling personnel exposure were evaluated by reviewing a Quality Assurance Surveillance Report (No. 2242 - Effectiveness of radiological controls implemented during radiography operations) and two radiation protection department self-assessments.
- The inspector reviewed recent DERs relating to the control of personnel exposure and work activities to determine if the issue was identified in a timely manner and that appropriate actions were taken to evaluate and resolve the issue. The regulatory significance of each issue was also evaluated. Included in this review were DER's 01-1839, 01-2059, 01-2118, 01-2319, 01-2331, 01-2382, and 01-2674.

b. <u>Findings</u>

No findings of significance were identified.

Public Radiation Safety [PS]

2PS1 Gaseous and Liquid Effluents

a. <u>Inspection Scope (71122.01)</u>

The inspector reviewed the following documents to evaluate the effectiveness of the radioactive gaseous and liquid effluent control programs. The requirements of the radioactive effluent controls are specified in the Technical Specification and the Offsite Dose Calculation Manual (TS/ODCM).

- The 2000 Radiological Semi-Annual Effluent Release Reports, including projected public radiation dose assessments
- Current ODCM (Revision 6, November 23, 1999)
- Technical justifications for ODCM changes made
- Upgrading process of the current ODCM to reflect the requirements (e.g., calibration frequency of radiation monitoring systems and flow rate measurement devices) listed in NUREG 1302, "Offsite Dose Calculation Manual: Standard Radiological Effluent Controls for Boiling Water Reactors"
- Analytical results for charcoal cartridge, particulate filter, and noble gas samples
- Quantification techniques for gaseous effluent releases
- Implementation of the compensatory sampling and analysis program when the effluent radiation monitoring system (RMS) was out of service
- Tracking and trending for the effluent RMS availability
- 2000/2001 gamma spectroscopy calibration records of all geometries

- Implementation of measurement laboratory quality control program, including intralaboratory and interlaboratory comparisons
- 2000/2001 Deviation/Event Reports (DERs) related to the effluent control program and resolutions
- 2001 NQA Audit Report (Report No. A01-03J, conducted from February 28, 2001 to March 13, 2001) for the implementations of the radioactive liquid and gaseous effluent controls and the ODCM
- 2000/2001 Quarterly Chemistry Self-Assessments
- Selected radioactive liquid and gaseous release permits
- Associated effluent control procedures
- Most recent surveillance testing results (delta P, visual inspection, in-place testings for HEPA and charcoal filters, air capacity test, and laboratory test for iodine collection efficiency) for the following air treatment systems, as required by TS 3/4.7.B and 3/4.11.A, respectively.
 - Standby Gas Treatment System
 - Main Control Room Ventilation
- Implementation of the NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal."
- Most recent channel calibration results for the following radioactive liquid and gaseous effluent radiation monitoring system (RMS), and liquid effluent flow rate measurement device. These requirements are listed in the ODCM Tables 2.1-2 and 3.1-2.
 - Liquid Radwaste Effluent Line RMS
 - Liquid Radwaste Effluent Line Flow Rate Measurement Device
 - Service Water Effluent Line RMS
 - Main Stack Exhaust Noble Gas Monitors (Normal and High Ranges)
 - Refuel Area Exhaust Noble Gas Monitor
 - Reactor Building Area Exhaust Noble Gas Monitor
 - Turbine Building Area Exhaust Noble Gas Monitor (Normal and High Ranges)
 - Radwaste Building Area Exhaust Noble Gas Monitor (Normal and High Ranges)
- Most recent calibration results for the gaseous effluent flow rate measurement devices (main stack, refuel area exhaust, reactor building area exhaust, turbine building exhaust, and radwaste building area exhaust)

The inspector toured the following systems and observed activities to evaluate the effectiveness of the licensee's radioactive gaseous and liquid effluent control programs.

- Walk-down for determining the availability of radioactive liquid/gaseous effluent RMS and for determining the equipment material condition
- Observed measurement techniques at the counting laboratory
- Walk-down for determining operability of air cleaning systems and for determining the equipment material condition

b. Findings

4. OTHER ACTIVITIES

40A1 Performance Indicator (PI) Verification

1. Safety System Unavailability, High Pressure Injection, Heat Removal and Emergency Diesel Generators

a. <u>Inspection Scope</u>

The inspector interviewed the system engineers responsible for monitoring these systems and reviewed the PI tracking records for the past four quarters. The inspector also reviewed operating logs to verify unavailability time was appropriately recorded. The inspector verified that the Entergy data collection and reporting met the standards of the NEI Guidance, NEI 99-02, Revision 1, "Regulatory Assessment Performance Indicator Guideline."

b. Findings

No findings of significance were identified.

2. Reactor Coolant System Activity, and Reactor Coolant System Leakage

a. <u>Inspection Scope</u>

Through interviews and the review of operators' log sheets and chemistry records, the inspector verified the reporting of the reactor coolant leakage and reactor coolant activity performance indicators. The inspector reviewed data from April 2001 through August 2001. The inspector verified that the Entergy data collection and reporting met the standards of the NEI Guidance, NEI 99-02, Revision 1, "Regulatory Assessment Performance Indicator Guideline."

b. Findings

3. Occupational Exposure Control Effectiveness

a. Inspection Scope

The inspector reviewed implementation of the Occupational Exposure Control Effectiveness PI Program. Specifically, the inspector reviewed corrective action program records for occurrences involving locked high radiation areas, very high radiation areas, and unplanned personnel exposures since the last inspection against the applicable criteria specified in NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 1, to verify that all occurrences that met the NEI criteria were recognized and identified as performance indicators.

b. Findings

No findings of significance were identified. The inspector noted that Entergy planned to report the Licensee Identified Violation involving Technical Specification 6.11, listed in Section 4OA7 of this report, as a performance indicator pertaining to Occupational Radiological Occurrence since it involved unauthorized entry to a Technical Specification High Radiation Area (> 1 rem per hour). The inclusion of this occurrence will not result in the PI exceeding a threshold.

4. RETS/ODCM Radiological Effluent Occurrences

a. <u>Inspection Scope (71151)</u>

The inspector reviewed the following documents to ensure Entergy met all requirements of the performance indicator from the first quarter 2000 to the first quarter 2001:

- Monthly projected dose assessment results due to radioactive liquid and gaseous effluent releases
- Quarterly projected dose assessment results due to radioactive liquid and gaseous effluent releases
- Associated procedures

b. Findings

No findings of significance were identified.

4OA6 Meetings

Exit Meeting Summary

On September 6, 2001, the inspectors presented the inspection results to Ted Sullivan and members of the Entergy staff. The inspectors asked whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

During the exit one licensee identified finding of very low safety significance was discussed, which was determined to be a non-cited violation (NCV). Should Entergy

elect to contest this NCV, a written response within 30 days of the date of this Inspection Report, with the basis for the denial, should be sent to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement, and the NRC Resident Inspector at the FitzPatrick facility.

4OA7 Licensee Identified Violations

The following finding of very low safety significance was identified by Entergy and is a violation of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG 1600, for being dispositioned as a Non-Cited Violation (NCV).

NCV Tracking Number

Requirement Licensee Failed To Meet

(1) NCV 05000333/2001-007-01

Technical Specification 6.11 requires that procedures for personnel radiation protection be adhered to for all plant operations. Contrary to this requirement, on June 13, 2001, workers entered the reactor water cleanup heat exchanger room, a locked high radiation area having radiation levels in excess of 1 rem per hour, without being authorized on the appropriate radiation work permit contrary to the requirements of radiation protection procedure RP-OPS-02.03. Reference DER 01-02319.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

a. Key Points of Contact

T. Bergene Supervisor, Radiation Protection Operations

R. Brown
G. Brownell
Dosimetry Supervisor
Licensing Engineer

L. Burrows Radiation Protection, Technician

M. Colomb Plant Manager

D. Harrison Dry Cask Engineering Project Manager

A. Holliday Licensing Manager
D. Johnson (Acting) Plant Manager

R. Lamb Health Physics Lead Technician W. Maguire General Maintenance Manager R. Miller Dry Cask Loading Manager

R. Murray Staff Health Physicist

R. Phelps Radwaste Shipping/Decontamination Supervisor

K. PhyP. PolicastroK. PusheeDry Cask Senior Project ManagerRadiation Protection SupervisorRadiation Protection Manager

J. Ratigan Assistant Radiation Protection Manager

D. Robert Radwaste Operations Supervisor

W. Rohr ALARA Engineer

R. Scott Radiation Protection Technician
J. Solini Quality Assurance Engineer

A. Stark ALARA Engineer

N. Starkweather Journeyman Radiation Protection Technician

T. Sullivan Site Executive Officer

G. Thomas Director Design Engineering
A. Zaremba Director of Safety Assurance

b. List of Items Opened, Closed and Discussed

Opened and Closed

50-333/01-07-01 NCV Failure to properly implement procedures for personnel

entry into a Locked High Radiation Area

c. <u>List of Acronyms</u>

ALARA As Low As Is Reasonably Achievable

AP Administrative Procedure

AR ALARA Review

C of C Certificate of Compliance

CW Circulating Water

DCSS Dry Cask Storage System
DER Deficiency and Event Report
EDG Emergency Diesel Generator
ESW Emergency Service Water
FSAR Final Safety Analysis Report

HEPA High Efficiency Particulate Air (filter)

IR Inspection Report

ISFSI Independent Spent Fuel Storage Installation

JPM Job Performance Measures

KV Thousand Volts

MPC Multi-purpose Canister NCV Non-Cited Violation

NDE Non-destructive Examination

NDT Non-Destructive Test

NRC Nuclear Regulatory Commission
NRR Office of Nuclear Reactor Regulation
ODCM Offsite Dose Calculation Manual

PI Performance Indicator
PID Plant Identified Deficiency
RFP Reactor Feed Pump

RHRSW Residual Heat Removal Service Water

RMS Radiation Monitoring System RWP Radiation Work Permit

SAR Safety Analysis Report

SDP Significance Determination Process

SER Safety Evaluation Report TS Technical Specification

d. <u>List of Documents Reviewed</u>

RP-OPS-02.02, Rev 6 RP-OPS-02.04, Rev 1 RP-OPS-02.03, Rev 1 RP-OPS-03.01, Rev 1 RP-OPS-03.02, Rev 3 RP-OPS-03.03, Rev 3 RP-OPS-03.05, Rev 1 RP-OPS-08.01, Rev 8 AP-07.01, Rev 7 AP-07.02, Rev 4 AP-07.03, Rev 2 AP-07.05, Rev 6	Radiation Work Permit Personnel Radiological Hold High Radiation Area Access and Key Control Radiological Survey Performance and Documentation Airborne Radioactivity Survey Techniques Radiological Postings and Labels Refuel Floor and Drywell Radiological Controls Routine Surveys and Inspections Radiation Work Permit Program Radiological Equipment Use ALARA Program Exposure Monitoring and Radiological Controls for RCA Access				
AP-07.06, Rev 9	High Radiation Area Control				
JRP-APL-01-002	2001 Radiation Field Control Program				
Source Reduction Log	2007 Hadiation Flora Control Flogram				
Self-Assessment					
(JRP-01-082)	Review of ALARA reports for accuracy and consistency				
Self-Assessment					
(JRP-01-081)	Status of Corrective Actions for DER 00-05643				
AP-07.01, Rev 7.	Radiation Work Permit Program				
AP-07.05, Rev 6.	Exposure Monitoring and Radiological Controls for Site & RCA Access				
AP-19.08, Rev 2.	Infrequently Performed Tests or Evolutions				
AR-01-032	ALARA Review, Dry Cask Storage Project				
GWP-5, Rev 4.	Spent Fuel Cask Welding				
LP-OPS-19-1	Lesson Plan, Dry Cask Storage, Operations Overview				
MT-4825.1	Lesson Plan, Dry Cask Storage, Hi-Storm Operations				
	Training				
MT-4825.2	Lesson Plan, Dry Cask Storage, Multipurpose Canister				
NIDED O 4 4/1) D	Sealing Operations				
NDEP 9.1.1(J), Rev 0.	Liquid Penetrate Procedure for the Hi-Storm 100 Dry Cask Fuel Storage System				
RWP-01-0053	Radiation Work Permit - Dry Cask Storage Activities				
SS-8/8-B,-C, -F, -HW	Welding Procedure Specification				
TMP-019.01, Rev 1.	MPC Welding Demonstration				
TMP-019.02, Rev 2.	MPC Sealing Demonstration				
TMP-019.03, Rev 1.	Weld Removal Demonstration				
Job Performance Measures and Training/Qualification Records Related To: Remov					
	MPC Hydro Test Skid, Vacuum Drying Skid, Helium Backfill				
Skid, and MPC Weld Removal					