

# Oversight Observation Checklist

O2C-IPEC-2005-0257

**Assigned to:** Picciano, Andy

**Date Performed:** 11/21/2005

**Duration:** 3

**Activity:** Observations and reviews relating to the IE Bulletin 80-10 and Tritium Discovery in a Unit 2 Monitor Well

**Reference Audit Area:** Effluent and Environmental Monitoring

**Reference Scope Element:** Radioactive Effluent Control

**Related Reference Audit Area:** Effluent and Environmental Monitoring

**Related Reference Scope Element:** Radioactive Effluent Control

**Surveillance Number:** QA 6 2005 IP1

**Feedback Provided To:** Chemistry and RP

**CR # or WO #:** Pending PCRS/LOCR

**Comments:** Tritium Discovery in a Unit 2 Monitor Well:

IPEC is currently reviewing the cause and effect of the leakage in the Unit 2 SFP. As part of this review, existing wells were sampled. In one well, MW111, tritium concentrations above the drinking water standard were discovered. The well was installed to monitor transformer oil, and was utilized because it is located less than 150 yards from the Unit 2 SFB. IPEC has performed a preliminary calculation, backed up by an independent vendor to determine the effluent effect of the tritium, bounding the release to less than 0.08 Ci and 1E-4 mrem, annually. These values will be re-assessed continuously with data from new monitoring wells established for this purpose. IPEC has not determined the effluent effect of the tritium but will know more over the next few years with routinely collected data from these water monitoring wells. The annual effluent and REMP reports will include a more detailed accounting of the tritium in the monitoring well.

Implementation of IE Bulletin 80-10 requirements by monitoring several discharge areas such as storm drains. IE Bulletin No. 80-10, "CONTAMINATION OF NONRADIOACTIVE SYSTEM AND RESULTING POTENTIAL FOR UNMONITORED, UNCONTROLLED RELEASE OF RADIOACTIVITY TO ENVIRONMENT:

IPEC is implementing the IE Bulletin 80-10 which states in part that nuclear plants are expected to identify systems that are considered as non-radioactive but could possibly become radioactive. IPEC established a routine sampling/analysis or monitoring program for these systems in order identify any contaminating events which could lead to unmonitored, uncontrolled liquid or gaseous releases to the environment.

A concern was raised. IE Bulletin 80-10 provisions are included in several site procedures, and not described in one program description document (one that also addresses all variables such as cost and performance). For example, current procedures define ground and water contaminations, but do not always link them to IE Bulletin 80-10. Chemistry is addressing the need to develop an effective monitoring program for storm drains and the monitoring wells described above. However, these actions do not include provisions for one definitive IE Bulletin 80-10 program. A recommendation for developing one program description document is suggested and will be proposed as a PCRS LOCR pending further discussion at the QA-6-2005 IP1 (E/E Audit) audit briefing.

As mentioned, Chemistry is addressing the need to develop an effective monitoring program for storm drains and the monitoring wells. This action was initiated due to a 2005 Condition Report CR IP2-2005-02893. The CR was issued primarily to address the deficiencies in the implementation of HP-SQ-3.013 rev.12, "Routine Surveys outside the Normal RCA" and Addendum 8.1 "Survey Frequencies. The surveys were not being performed, and there were no guidance in the procedure for several areas such as how to collect and analyze annual sediment samples for gamma and tritium (liquid scintillation by Chemistry). The complete data from these surveys were not retained. Also, historical data for tritium in the Unit 2 storm drains (some of data for tritium was in the order of 2.0E-6, where other data was in the order of 5.0E-6) has not been satisfactory trended.

The corrective actions for CR IP2-2005-02893 require that a storm drain and monitor well sampling program be developed and implemented by Chemistry for IPEC. HP-SQ-3.013 was voided on 6/7/05. However, the record issued to void HP-SQ-3.013 rev.12 incorrectly states that 0-RP-NEM-105 will replace HP-SQ-3.013. This record should be revised.

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		S	U	NA	NV
<b>S A F E T Y</b>	Use of PPE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Use of fall protection in excess of 6'	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Gas cylinders properly stored and secured	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Confined space posted and proper communications maintained based on permit requirements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Electrical power tools provided with ground continuity monitor or ground fault circuit interrupter	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Adequate ventilation and protective clothing during welding/cutting or when working in electrical enclosures	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>P R E J O B</b>	Thorough review of Work Order and Procedure with responsible crew	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Critical steps reviewed to prevent errors	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Lessons learned from similar activity shared	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Discussion of communication process to be used, Point of Contact, Notification to Operations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Assignment of the Dual or Independent Verifier made before the start of the job	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Assuring the crew was qualified to perform the tasks associated with the task assignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	All required parts and tools available prior to starting the activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>O E</b>	Actions needed to take in the event of a problem	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Internal OE information associated with Nuclear Safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Internal OE information associated with Industrial Safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Internal OE information associated with Radiological Safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	External OE information associated with Nuclear Safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	External OE information associated with Industrial Safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>C O N T R O L S</b>	External OE information associated with Radiological Safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Pre-job walk down conducted	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Authorization, clearance and permits approved, signed and available	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	M&T equipment calibrated / correct range	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Replacement parts/material are certified and identical to those they replace	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Weld filler material control has been established and issue requisition displays all necessary data to assure traceability/continuity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Identify areas for fleet standardization	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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<b>R P</b>	Personnel implement RWP requirements, dosimetry placement, frisking/WBCSS, donning & doffing of PCs and use of step off pads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Radwaste is minimized by maintaining disposable material entering the RCS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Containment controls & sound radiation work practices were continually maintained	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>H P E</b>	Self-Cheeking-Identification of Potential Error Traps	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Peer Checking	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Team Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Use of STAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Use of SAFE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Stop Unsafe Work Practices	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>P R O C E D U R E</b>	Latest version of the procedure in use	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Placekeeping used	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Strict procedure adherence	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Precautions/prerequisites are followed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Entries properly recorded	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>C O M M</b>	Accuracy of paperwork	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Use of 3-Point Communications	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Use of a Questions Attitude-Worker Attitude	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Face-to-Face	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>F M E</b>	Management or Supervisory Presence in the Field	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Appropriate Class of System cleanliness and level of FME is maintained	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Housekeeping-General debris minimized and work area left clean and hazard free	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Temporary plugs and dams in pipes are: Suitable Material, Adequately Secured, Properly Identified and Recorded in Work Package	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	External OE info associated with nuclear safety covered during pre-job briefing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>