

**Point Beach U1R28 Interim Exit Meeting - 04/23/2004 @ 1030 HRS**1. Introduction

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2. Focus & Scope

Cornerstone: Occupational Radiation Safety  
Focus: ALARA Planning and Controls; Access Control to Radiologically Significant Areas  
IP: 71121, Attachments 2 & 1

3. Overall Summary

Did NOT identify any FINDINGS in these areas, as defined by the NRC's Reactor Oversight Program.

As such, the results of my inspection will be included in 2<sup>nd</sup> Quarter Resident IR 2004-03.

4. Details

I would now like to discuss specific areas of the inspection, and provide you with some observations. Note that specific observations will not be included in the report and, as always, the results of our inspection are subject to regional management review.

**Access Control****Plant Walkdowns & RWP Reviews**

Reviewed the station's implementation of physical and administrative controls over access to radiologically significant areas, including worker adherence to these controls by reviewing station procedures, RWPs and walking down areas in PAB (limited) & Unit 1 containment.

*Comment:* Controls - adequate and in compliance with procedures and NRC requirements.

This review included the station's implementation of "alternate" LHRA controls (flashing light, rope, posting) for those areas >1000 mrem/hr which were not lockable [recent industry dialogue with the NRC about appropriate controls].

*Observation:* NRC personnel observed less than rigorous control/challenging of personnel entering containment at 66' level Fan Room. Specifically, the RP group challenges workers at the RCA control point relative to RWPs & ED setpoints, and workers are required to check in with the RP control desks for their working floor in containment, HOWEVER, there appears to be little challenging of workers & the appropriateness of PC dress-out at the 66' entry point. The RPTs at the point are focusing on doffing of PCs at the exit point to minimize PCEs and Ram Control events

(appropriately), but don't appear to be specifically challenging workers entering. Relying on Radworker training and peer checks only.

Given the low number of significant PCEs >5k (6 so far) this is not currently a regulatory issue, but is definitely a poor HP practice. Has been commo'd to RP Dept. and they are addressing the comment.

### **Radiological Planning & Job-In-Progress Reviews**

Prior to my activities onsite, I reviewed information regarding plant collective exposure history, current exposure trends, and planned activities for the U1R28 outage in order to assess current performance and exposure challenges.

Onsite I reviewed the ALARA work activity evaluations, exposure estimates, and exposure control requirements for several work activities of highest exposure significance during U1R28 (>5 person-rem). Specifically reviewed the RWP/ALARA plans for:

- Undervessel Bare Metal Inspection & Insulation work
- S/G Eddy Current Testing

Additionally reviewed the ALARA packages for three additional jobs which presented radiological and/or work execution challenges during the outage:

- Reactor Head Lift
- Nozzle Dam Installation & Removal
- Replacement of the Cono-seal Bullet

Reviewed these packages to determine if the station had established procedures, engineering and work controls to achieve occupational exposures that are ALARA & to support my assessment activities in the field.

I also reviewed WIP reviews for the some of these activities to assess the station's method for adjusting exposure estimates, or re-planning work, when unexpected changes in scope, emergent work, or unanticipated dose rates were encountered.

*Comments:* With respect to BMI work, the station's corrective actions relative to the insulation installation problems from Unit 2's outage (which I discussed during my last inspection), appear to have been effective in maintaining doses ALARA as reflected in the collective dose for the job (~5.9 rem vs est of 6.1 rem & U2 actual 10.6 rem).

Throughout these two weeks, I attended JIT Info Sharing sessions and RWP briefings, observed most of these activities (S/G Eddy Current Testing, Reactor Head Lift) and others (RCP 'B' Motor Lift) to confirm that the radiological and engineering controls planned for (including the use of multiple & repositioned dosimetry) were actually in place and used during the work activities. Yesterday, I also observed the briefs and preps for the Replacement of the Cono-seal Bullet. I did not observe the actual work, another NRC inspector did, and work progressed well (280 mrem VS est 1500 mrem) once a variety of safety and radiological concerns (by the workers) were addressed.

**Comments:** Station's operation/maintenance challenges this outage have resulted in the significant delays in work, and we've observed at least a couple of examples where workers are milling around containment (RCP B Motor Move and, yesterday on 21' level). Though general area dose rates are low in Cntmnt this does result in low level aggregation of dose - Not consistent with ALARA principle.

Additionally, all the emergent operational challenges are resulting in increased dose for the outage. RP is currently reforecasting the dose estimates for the outage now that the outage seems to be moving toward a more consistent schedule — Request to be kept in the loop on the radiological progress of the outage via RP (Thomas & Carberry).

#### **Radworker Performance and RPT Proficiency:**

Additionally, my observations of the work activities were also focused on Radworker Performance and RPT Proficiency, to determine if there was any observable negative human performance trends in these areas.

- Comments:**
- (1) My observations of radworker performance relative to their knowledge of ED setpoints & appropriate alarm responses, use of low dose waiting areas, and minimizing the potential for PCEs.
  - (2) Noted that the RP Staff generally continue to provide clear and effective briefs and effectively oversee their assigned work activities, even given the emergent work. Only exception is the previously noted control of Containment entry at the 66' level Fan Room.

#### **Problem Identification & Resolution**

Reviewed a variety of CAP's related to ALARA and Access Controls surrounding U1R28.

PI & R documents were reviewed to assess the station's ability to identify repetitive problems, contributing causes, the extent of conditions, and implement corrective actions intended to achieve lasting results.

**Comments:** Outage RP issues are being captured, and immediate corrective actions taken, but again, the true test will be the implementation of long term corrective actions and their effectiveness. Already noted that corrective actions for the BMI insulation work appear to have been effective.

### 5. Conclusion

#### **OVERALL COMMENT:**

Radiologically the station has been challenged this outage due to the operational/emergent issues, which is results in increased overall dose (though not clearly measured at this point). I intend on maintaining contact with RP over the duration of the outage to understand your radiological progress and issues, and will be closely at looking at the total dose costs (via post-job reviews) for this outage during my post-outage inspection later this year (week of October 18).

This concludes my presentation for this meeting.

I will be onsite the Week of July 26 for the Biennial Liq/Gas Effluent inspection.

Any proprietary information?  
Do you have any questions?