



## **INDUSTRIAL** SERVICES OF NEW YORK, INC.

January 26, 1982

United States Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia. Pennsylvania 19406

## Gentlemen:

Pursuant to your letter received by us on December 28, 1981. the following is our statement describing the steps we are taking to ensure that our employees strictly adhere to all requirements placed on them by N.R.C. licensees in accordance with their license obligations.

Because of the gravity of the violations committed by some Cleanco personnel at Indian Point II Station during the spring of 1981, we have determined that more stringent management controls in the areas of personnel screening, radiation protection training and communications are necessary. In accordance with this determination, the following list outlines the actions which we are taking to eliminate the possibility of further violations of N.R.C. requirements:

- We have completely reorganized our new employee screen-1. ing procedure to include more comprehensive psychological testing and a more thorough background check for each new applicant for employment.
- More education and/or Nuclear experience is now being required for new personnel. (Both of the above steps are being implemented within the guidelines of the U.S. Privacy Act (5 U.S.C. - 552a)).
- All new employees are being made aware of the necessity 3. of adhering to all radiation safety procedures and the severe disciplinary actions which will be taken for knowingly violating them.

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- 4. We are in the process of hiring additional radiation protection personnel. These personnel are qualified Health Physicists whose responsibility it will be to monitor all Cleanco employees in regards to safety and radiation controls.
- 5. Radiation safety courses and quizzes are being given to employees at each Nuclear project on a monthly basis. These courses are being administered by a member of our staff who is a qualified Radiation Protection Manager.
- 6. We have significantly decreased the worker/supervisor ratio on all Nuclear projects.
- 7. Project management will be rotated periodically.
- 8. We have established a monthly training program for all Field Supervisors and Site Coordinators.
- 9. We have significantly increased site inspections by corporate management.
- 10. Every Nuclear employee has been advised of his responsibility to follow all N.R.C. regulations and to inform management of any violations either observed or suspected. All Nuclear employees have also been advised that a failure to demonstrate a serious and professional attitude towards the regulations and safety procedures of all N.R.C. licensees, in accordance with their license obligations, will result in immediate termination of employment.
- 11. A central computer has been installed in our Long Island City, N.Y. offices, along with the latest teletype equipment. This equipment affords us the capability of daily examination of personnel dose rates and hours worked for every Nuclear employee. A correlation of exposure/per unit time, either cumulatively or individually, can thereby be ascertained. More advanced programs are now being designed to allow us even more corporate control in all areas of field operations.

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12. All Nuclear employees have been readvised as to the Fossil and Mechanical division of Cleanco. With the current backlog of fossil and mechanical work, no worthy Nuclear employee need suffer lost time due to utility and/or company exposure limits. We are also studying other means of instilling greater employee motivation.

In summation, we the management of Cleanco Industrial Services of New York, Inc. feel a heavy responsibility for the violations which occurred at Indian Point Station II. We feel that the aforementioned steps, coupled with an ongoing policy of striving for even better safeguards, will lead us to our ultimate goal; the complete elimination of the possibility of an infraction of any safety or procedural regulation of N.R.C. licensees in accordance with their license obligations.

Gene M. Belsole President

GMB: ahc

cc: Mr. Eugene R. McGrath
Senior Vice President, Power Generation
Consolidated Edison Co. of N.Y., Inc.
Mr. Charles W. Jackson
Vice President, Nuclear Power
Consolidated Edison Co. of N.Y., Inc.

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