

Consolidated Edison Company of New York, Inc.
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March 21, 1979

Mr. George H. Smith, Chief
Fuel Facility and Materials Safety Branch
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Smith

This refers to Combined Inspection 50-003/78-13 and 50-247/78-38 conducted by Mr. D. Neely on December 27-29, 1978, and January 17-18, 1979, of activities authorized by NRC License No. DPR-5 and DPR-26. Your February 28, 1979 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements. This activity was set forth in the Notice of Violation enclosed therewith as Appendix A. With respect to this item, our response is as follows:

As noted in the report, we had concluded for the incident in question, that the individual did not receive the whole body exposure as indicated on the film badge and TLDs. Those factors noted in paragraph 4 on page 4 of your report were set forth as the basis for our determination. However, our determination also included an evaluation of available dose rates and residence times which we have been able to reconstruct for the periods of time in question, which was not included in your report.

These dose rates and residence times differ from those postulated by your inspector but are consistent with exposures received while performing these particular operations over many years. Further corroborative evidence is the statements by both the health physics technicians and fellow workers that there were no unusual occurrences during the periods in question. Specifically, our evaluation, based on

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the most conservative cases, showed that for the total eighteen (18) hours of sign-in time for Individual A, in Unit 1 Drumming Area, the maximum total accumulated dose could have been 2060 mRem. The basis for this determination is as follows:

<u>Sign-In Time</u> (Net Hrs.)	<u>Time in Area</u> (% Sign-In Time)*	<u>Dose Rate</u> (mR/Hr)	<u>Dose</u> (mRem)
<u>General Area</u>			
18	9.5	400	685
18	9.5	700	1200
18	36	15	100
<u>2 ft. from Radwaste Drums (Body Position)</u>			
18	3	135	75
Total Accumulated Dose			2060 mRem

*Percentage of time not accounted for was utilized in transit, donning and removal of anti-C clothing, etc.

These data indicate that the conditions to which "Individual A" was exposed are not consistent with a dose in excess of 3,000 mRem.

We believe that the selective use of the film badge data is unwarranted. Similar quality control is provided by our processor for TLD chips 3 and 4. These TLDs show exposures less than 3000 mRem. Furthermore, the use of the term "legal dosimetry" relative to our film badge data introduces a concept which does not appear in either NRC regulations or the license. Con Edison does not limit its dosimetry to film badge data. Our current procedures allow the use of film or TLD as the primary monitoring device. Con Edison has traditionally used the film badge results but evaluations are made and other data are utilized in determining the exposure of an individual. For this very reason, Con Edison has adopted a dosimetry system that includes both film and TLD.

Based on the above and those factors presented in the inspection report, we do not feel that an infraction has occurred. We recognize the need to be conservative in this situation and we propose, therefore, that the exposures recorded by the two quality

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controlled monitoring devices, the film badge and the highest of the TLDs (3300 mRem and 2610 mRem), be averaged and the resultant exposure (2955 mRem) be assigned to individual A.

As a means for reducing the potential for future problems of this type, we are currently developing techniques to avoid some of the variables which could lead to SRD/film badge anomalies. For example, we are instituting a program which would check the ability of an individual to properly read the SRD. Preliminary results are anticipated within several months.

Very truly yours

A handwritten signature in cursive script, appearing to read "William J. Cahill, Jr.", written in dark ink.

William J. Cahill, Jr.
Vice President