RE#CORD #237

TITLE: **Request for Comments on Responses to Licensee Questions on High Radiation Area Controls**

JUN 21 1989

HPP

NOTE FOR: Walter J. Pasciak, Section Chief, EPRPB, DRSS, Region I
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FROM: Jim Wigginton, Section Chief, RPB, DREP, NRR

SUBJECT: REQUEST FOR COMMENTS ON RESPONSES TO LICENSEE QUESTIONS ON HIGH RADIATION AREA CONTROLS

Tom Essig and I had a teleconference with two utility HPs (Susquehanna) concerning implementation of the 10 CFR Part 20 and Technical Specifications (Administration Section 6) requirements for high radiation area controls. Specially, the licensee had questions concerning IN-88-79, which alerted licensees to several instances where plants had not properly controlled areas greater than 1,000 mR/hr (improper use of the "flashing light" option). PRPB is proposing the following as generic guidance. Your input and comments are requested prior to issuance.

Q 1 - Can temporary shielding be used as a long-term solution to reduce radiation levels down below 1,000 mR/hr (to avoid locking an area > 1,000 mR/hr).

Answer - No, other techniques to reduce source term should be used (e.g., chemical decon, permanent shielding). However, as long as reasonable progress is made toward the long-term fix (and a effective system to preclude unauthorized removal of temporary shielding exists), the judicious use of temporary shielding could be justified on an interim basis. In general, however, the radiation source in-growth rate should allow for prudent and timely compensatory action to avoid the frequent use of temporary shielding for this purpose.

Q 2 - Can a computer card (magnetic card) be used in lieu of a classical, physical key-lock to meet the locking requirements?

Answer - As with the security requirements of 10 CFR 73 (Physical Protection of Plants and Material, § 73.2(m)), an access control system governed by computer mag-cards is acceptable and meets the STS and 10 CFR 20.203(c)(2)iii requirements for locking high radiation areas. However, the licensee must maintain positive controls over each entry, and satisfy all other existing entry and surveillance requirements for high radiation areas.

Your responses can best be made by telephone to me (492-1136) or John Buchanan (492-1097). We appreciate your help.

Original signed by James E. Wigginton

Jim Wigginton, Section Chief, RPB, DREP, NRR

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