

Southern California Edison Company

SCED

P. O. BOX 800

2244 WALNUT GROVE AVENUE
ROSEMead, CALIFORNIA 91770

TELEPHONE
915-872-1474

L. T. PAPAY
VICE PRESIDENT

September 24, 1980

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region V
1990 North California Boulevard
Suite 202, Walnut Creek Plaza
Walnut Creek, California 94596

Attention: Mr. R. H. Engelken, Director

DOCKET No. 50-206
SAN ONOFRE - UNIT 1

Dear Sir:

By letter dated September 3, 1980, NRC Inspection Report No. 50-206/80-22 was transmitted. This letter included as Attachment A a Notice of Violation. Enclosure (1) to this letter provides our response to Appendix A.

Your letter also requested we discuss actions we have taken or plan to take to improve the effectiveness of our radiation protection during major outage conditions. Based on your telephone discussion with Mr. D. E. Nunn on September 11, 1980, we will provide the requested information as part of our response to the Health Physics Appraisal Report which is scheduled for submission to your office on September 30, 1980.

I trust the enclosure responds adequately to all aspects of the Notice of Violation. If you have any questions, or if we can provide additional information, please let me know.

Very truly yours,



Enclosure

cc: L. F. Miller
U. S. NRC Site Inspector
San Onofre - Unit 1

80-285

8010210442

ENCLOSURE (1)

RESPONSE TO NOTICE OF VIOLATION
DATED SEPTEMBER 3, 1980

NOTICE OF VIOLATION

- A. 10 CFR 20.101, Radiation Dose Standards for Individuals in Restricted Areas, paragraph (b) states "A licensee may permit an individual in a restricted area to receive a total occupational dose to the whole body greater than that permitted under paragraph (a) of this section, provided:

(1) During any calendar quarter the total occupational dose to the whole body shall not exceed 3 rems..."

Contrary to the above, a contractor employed individual whose accumulated occupational exposure history was on file, received an exposure of 3.5 rems during the second calendar quarter of 1980.

This is an infraction.

- B. 10 CFR 20.201(b) requires licensees to make surveys as may be necessary for him to comply with the regulations in 10 CFR 20. Surveys are defined in 20.201(a) as "an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of level or radiation or concentrations of radioactive material present".

Contrary to the above, evaluations of the radiation dose received by an individual during the second calendar quarter of 1980 were not adequate to assure compliance with 10 CFR 20.101(b) in that a contractor employed individual received a dose of 3.5 rem.

This is an infraction.

Response: Corrective Steps Which Have Been Taken And Results Achieved

A thorough investigation of the incident was conducted. All station dosimetry reports and exclusion area entries for the individual during the months of April, May and June, 1980 were reviewed in detail. No discrepancies for reported data were detected.

Based on our review and evaluation of this case, the overexposure of the individual resulted from inadequate implementation of administrative controls. Self reading dosimeters were read by the individual and may have been incorrectly reported to the computer terminal operator. Late film badge analysis reports by the film badge company and delays in entering data into the computer program at the station both contributed to the problem.

Corrective Steps Which Have Been Taken to Avoid Future Items of Non-Compliance.

A thorough evaluation of the circumstances surrounding the personnel over-exposure was performed. The following actions have been taken to preclude a recurrence of this event.

1. All self-reading pocket dosimeter results are being checked by a health physics monitor or an operator at the controlled area entry/exit points.
2. The film badge company has been notified that all results greater than 400 mR must be reported promptly as per our agreement.
3. Additional personnel have been assigned to dosimetry and record keeping functions to assure that film badge data will be promptly entered into the computer system.
4. The effectiveness of these corrective actions will be reviewed by the Chem-Rad Protection Engineer to assure proper evaluation of exposure data.
5. The QA organization will provide an independent audit of the effectiveness of the actions.
6. All dosimetry section personnel have been instructed in the importance of timely data processing.

We believe that the measures described above will prevent a recurrence of the incident.

The Date When Full Compliance Will Be Achieved

The facility is now in compliance.

NOTICE OF VIOLATION

- C. Technical Specification Section 6.11 requires that written procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Radiation Protection Procedure VII 1.5 Access to Controlled and Exclusion Areas, Rev. 3 January 1979, Part III E-3 states: "A pocket dosimeter will be issued and read by the Exclusion Area Monitor prior to each person's entry into the main controlled area. The dosimeter will be returned to and read by the monitor when the person leaves the Controlled Area."

Contrary to the above requirements, at numerous times during the period from April 15 to June 15, 1980, individuals who were leaving the controlled area and who were not the Exclusion Area Monitors, read and reported their own pocket dosimeters.

This is an infraction.

Response: Corrective Steps Which Have Been Taken and Results Achieved.

The requirement for Exclusion Area Monitors to read pocket dosimeters has been re-emphasized to all personnel. The responsibility for reading dosimeters and informing the data processor of the dose to be credited to the individual has been assigned to radiation protection personnel.

Corrective Actions Which Will Be Taken To Avoid Future Non-Compliances

We believe that recent and planned increases in staff, available equipment and planned facility expansion will greatly reduce the probability of recurrence. These increases and modifications will be detailed in our reply to your recent Health Physics Appraisal, which will be forwarded by September 30, 1980.

Date When Full Compliance Will Be Achieved

The facility is now in full compliance.