

APPENDIX A

Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Docket No. 50-206

License No. DPR-13

SIGNIFICANT APPRAISAL FINDINGS

Based on the Health Physics Appraisal conducted May 19-30, 1980, the following items appear to require corrective actions. (Section references are to the Details portion of the enclosed Inspection Report.)

1. Radiation Protection Organization and Management

The present level of staffing in the Chemistry and Radiation Protection Group at the technician, first line supervisory and professional level is not sufficient to allow necessary training and retraining activities, to assure continued radiation protection program quality in the event of the loss or absence of personnel, and to permit adequate performance under nonroutine and possibly during routine operations. The planned transition to a 24 hour, seven day manning schedule further compounds this problem. The absence of a corporate health physics staff prevents technical support of station activities and denies to management the guidance and quality assurance functions such an organization could provide. (Sections 2.1 and 2.2)

2. Personnel Selection, Qualification and Training

A specialized training, retraining and replacement training program in radiation protection, appropriate for each discipline, has not been established, implemented, maintained and documented for the station staff. In addition, all personnel having access to restricted areas should be instructed in those areas required by 10 CFR 19.12, Instructions to Workers and such instruction documented. (Sections 3.2.1, 3.2.3, 3.2.4).

REGULATORY DOCKET FILE COPY

3. Exposure Controls - Health Physics Instruments

The supply of operable, portable radiation protection instruments was only marginally adequate for routine operation and was inadequate for outage conditions or emergency response. (Sections 4.3.5 and 8.0)

4. Radioactive Waste Management

The solid radioactive waste management program fails to provide for the assignment of functional responsibility or for continuity of staffing support, further the existing facilities are not adequate to provide a storage capability which does not impact on facility operations in the event of the loss of the ability to dispose of wastes promptly. (Section 5.3)

5. ALARA Program

The ALARA program is notably lacking in such areas as program formalization, assignment of responsibility and authority and preplanning of activities. (Section 6.0)

6. Facilities and Equipment

The existing facilities at the Health Physics Office and Door 16 are inadequate for the various activities which must be conducted. These activities include personnel decontamination, control of access to the Controlled Access Area, personnel frisking, primary system sampling and health physics support activities. The use of the existing facilities should be evaluated and changes or alternatives considered. (Sections 7.3 and 7.4)

7. Emergency Response Capabilities

The capability to respond to an emergency is limited by the size of the radiation protection staff, the level of training and is significantly lacking because of deficiencies in the area of equipment and supplies and the maintenance of such materials. (Section 8.0)

APPENDIX B

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NOTICE OF VIOLATION

Based on the results of the Health Physics Appraisal conducted on May 19-30, 1980 certain activities conducted under your license appear to be in noncompliance with NRC requirements as identified below.

1. Title 10 CFR 20.203(f)(1)&(2) requires that containers of licensed materials bear a durable clearly visible label identifying the radioactive contents. Section (f)(3) of this requirement provides certain exclusions to this requirement.

Contrary to the above on May 19, 1980, multiple containers of packaged or partially package radioactive waste were observed by the inspector to be unlabeled. Appropriate labeling was promptly applied when called to the licensee's attention an action which was confirmed by the inspector on May 28, 1980. None of the exclusions in 10 CFR 20.203(f)(3) were applicable. (Section 5.3)

This is a deficiency.