

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

REACTOR FACILITIES BRANCH

FILE COPY

OCT 21 1975

Niagara Mohawk Power Corporation
Attention: Mr. R. R. Schneider
Vice President
Electric Operations
300 Eric Bouleyard West
Syracuse, New York 13202

License No. DPR-63
Inspection No: 50-220/75-12
Docket No. 50-220

Reference: Your letter dated September 5, 1975
In response to our letter dated August 14, 1975

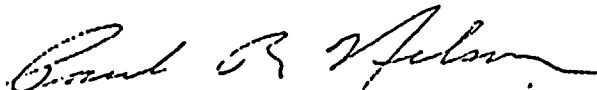
Gentlemen:

Thank you for informing us of the corrective and preventive actions you documented in response to our correspondence.

Until such time that your possession of the source is licensed you remain in noncompliance as stated by the Notice of Violation transmitted by our letter dated August 14, 1975.

These actions will be examined during a subsequent inspection of your licensed program.

Sincerely,



Paul R. Nelson, Chief
Radiological and Environmental
Protection Branch

cc: T. E. Lemoges, General Superintendent, Nuclear Generation
T. J. Perkins, Plant Superintendent
C. L. Stuart, Operations Supervisor
E. B. Thomas, Jr., Esquire
A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment



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bcc:

IE Mail & Files (For Appropriate Distribution)

PDR

Local PDR

NSIC

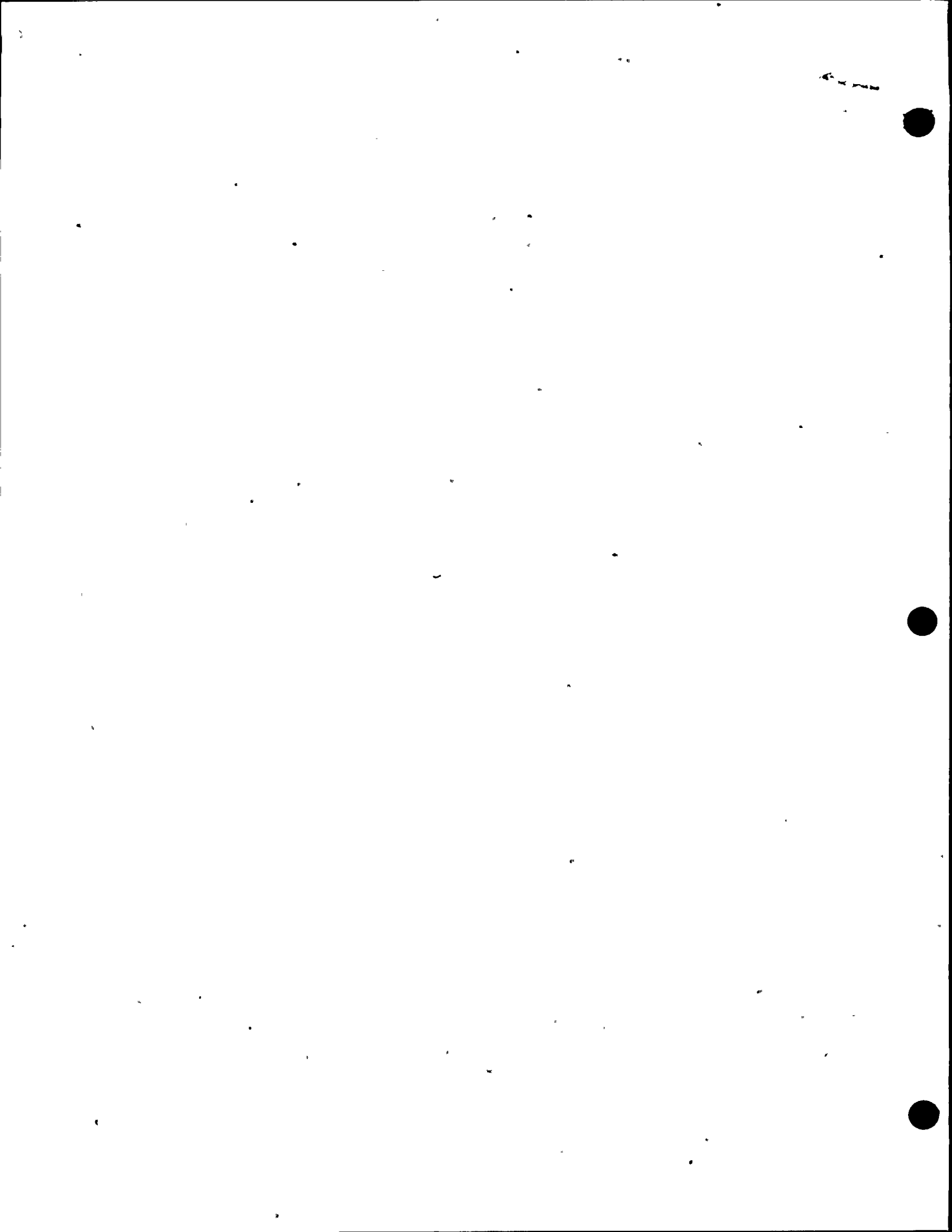
TIC

REG:I Reading Room

~~Region Directors (II, III, IV) (Report Only)~~

State of New York

~~A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment~~



Central files

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

AUG 14 1975

Niagara Mohawk Power Corporation
Attention: Mr. R. R. Schneider
Vice President, Electric Operations
300 Erie Boulevard West
Syracuse, NY 13202

License No. DPR-63
Inspection No. 75-12
Docket No. 50-220

Gentlemen:

This refers to the inspection conducted by Mr. K. E. Plumlee of this office on July 16-18, 1975 at Nine Mile Point 1 of activities authorized by NRC License No. DPR-63 and to the discussions of our findings held by Mr. Plumlee with Mr. Lempges and other members of your staff at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Plumlee and Mr. Lempges on July 21, 1975.

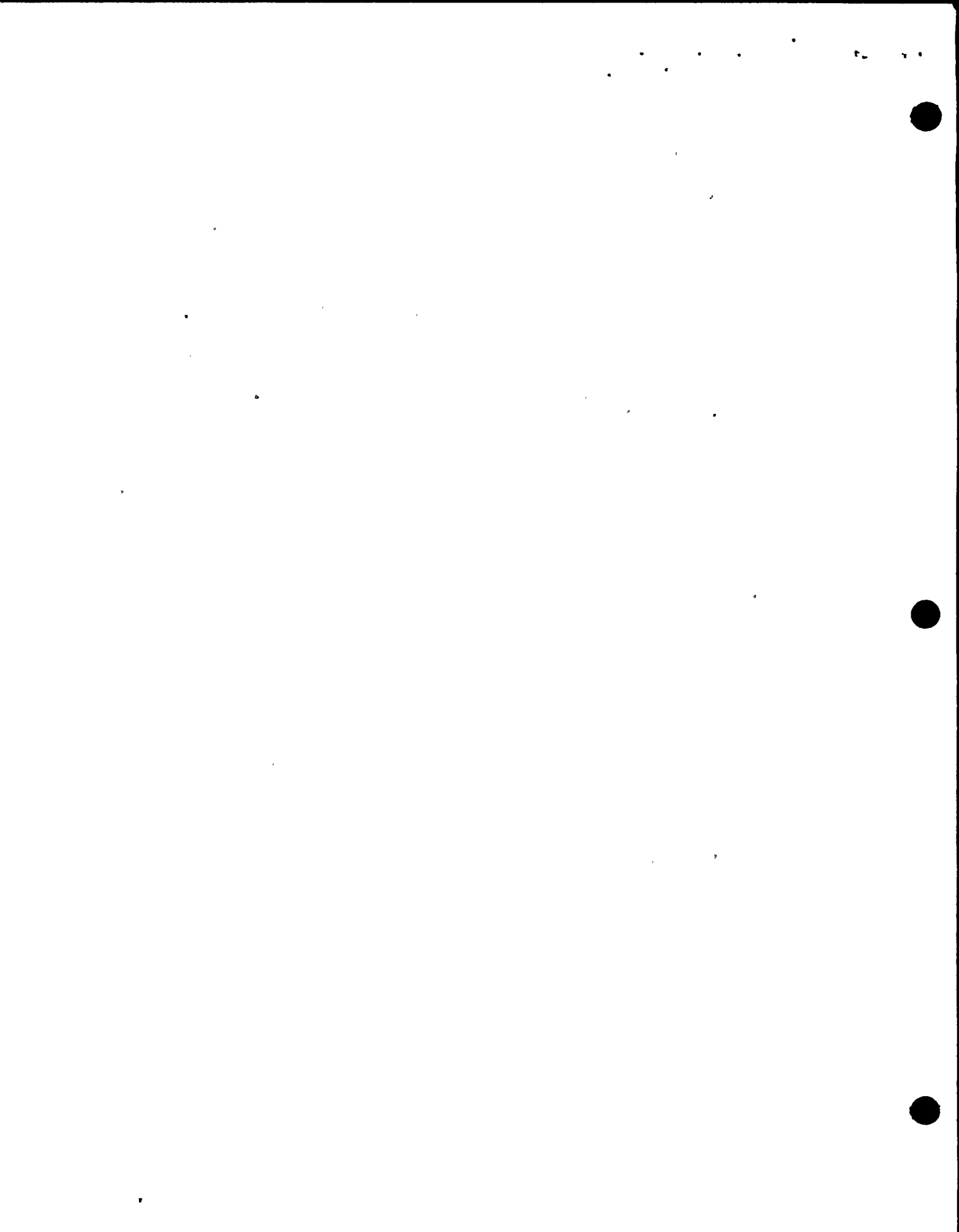
Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Our inspector also verified the steps you have taken to correct the items of noncompliance brought to your attention in a letter dated May 23, 1975. We have no further questions regarding your action at this time.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved.



ll

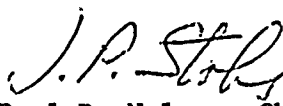


As indicated in Appendix A, we note that you have corrected Item No. B, and therefore you need not address yourself to this matter in your response.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

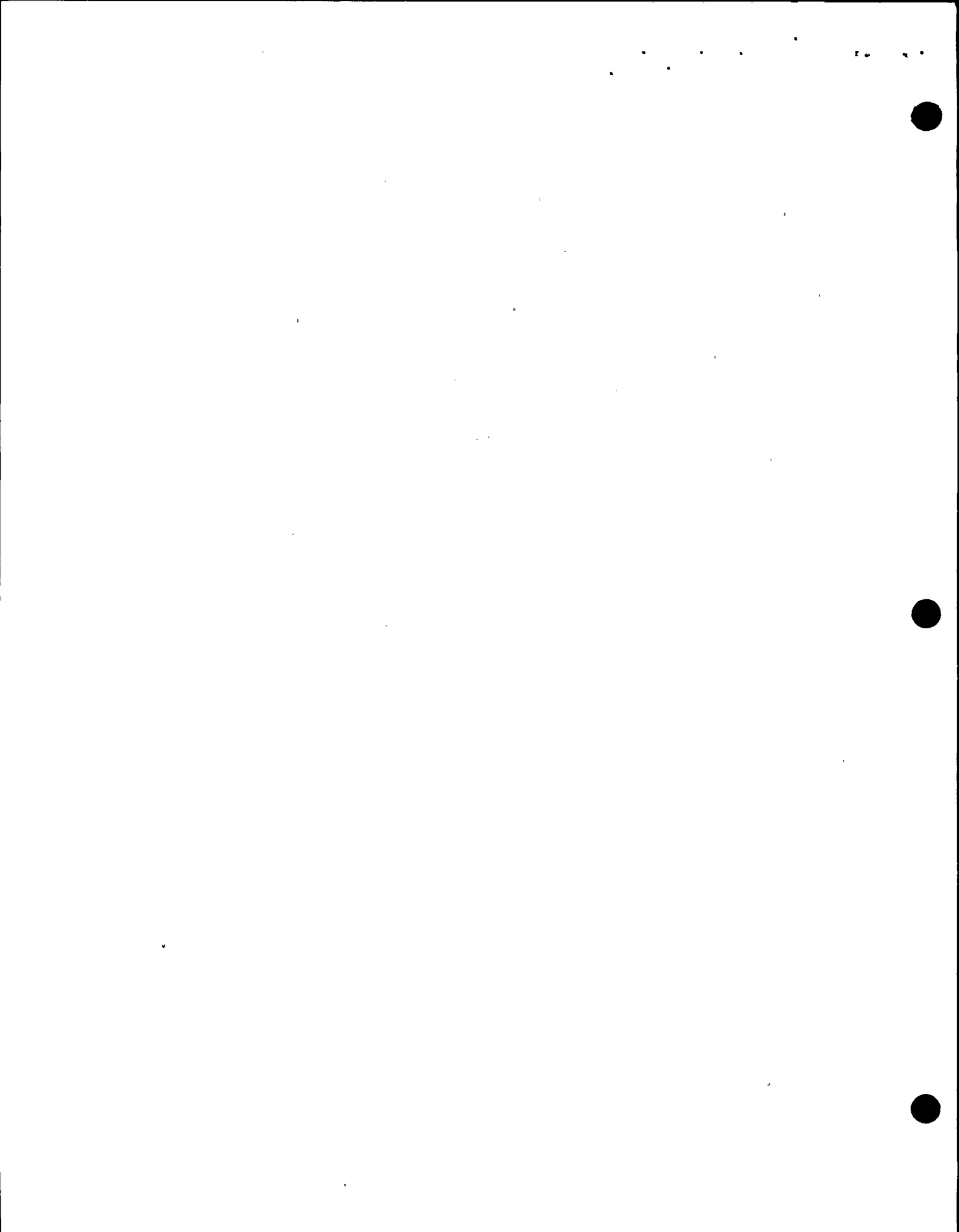
Sincerely,


Paul R. Nelson, Chief
Radiological and Environmental
Protection Branch

Enclosure:

1. Appendix A, Notice of Violation
2. IE:I Inspection Report No. 50-220/75-12

cc: T. E. Lempges, General Superintendent, Nuclear Generation
T. J. Perkins, Plant Superintendent
C. L. Stuart, Operations Supervisor
E. B. Thomas, Jr., Esquire
A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment (Without Report)



bcc:

IE Chief, FS&EB

IE:HQ (4 cys ltr, 5 cys report)

IE Files

Central Mail & Files

Directorate of Licensing (4 cys ltr, 13 cys report)

Regulatory Standards (1 cy ltr, 3 cys report)

PDR

Local PDR

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ELD

State of New York

A. Z. Roisman, Counsel for Citizens Committee for
Protection of the Environment

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APPENDIX A

NOTICE OF VIOLATIONS

Niagara Mohawk Power Corporation
Syracuse, New York 13202
License No. DPR-63

Based on the results of an NRC inspection conducted on July 16-18, 1975 it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Reactor License No. DPR-63 as indicated below:

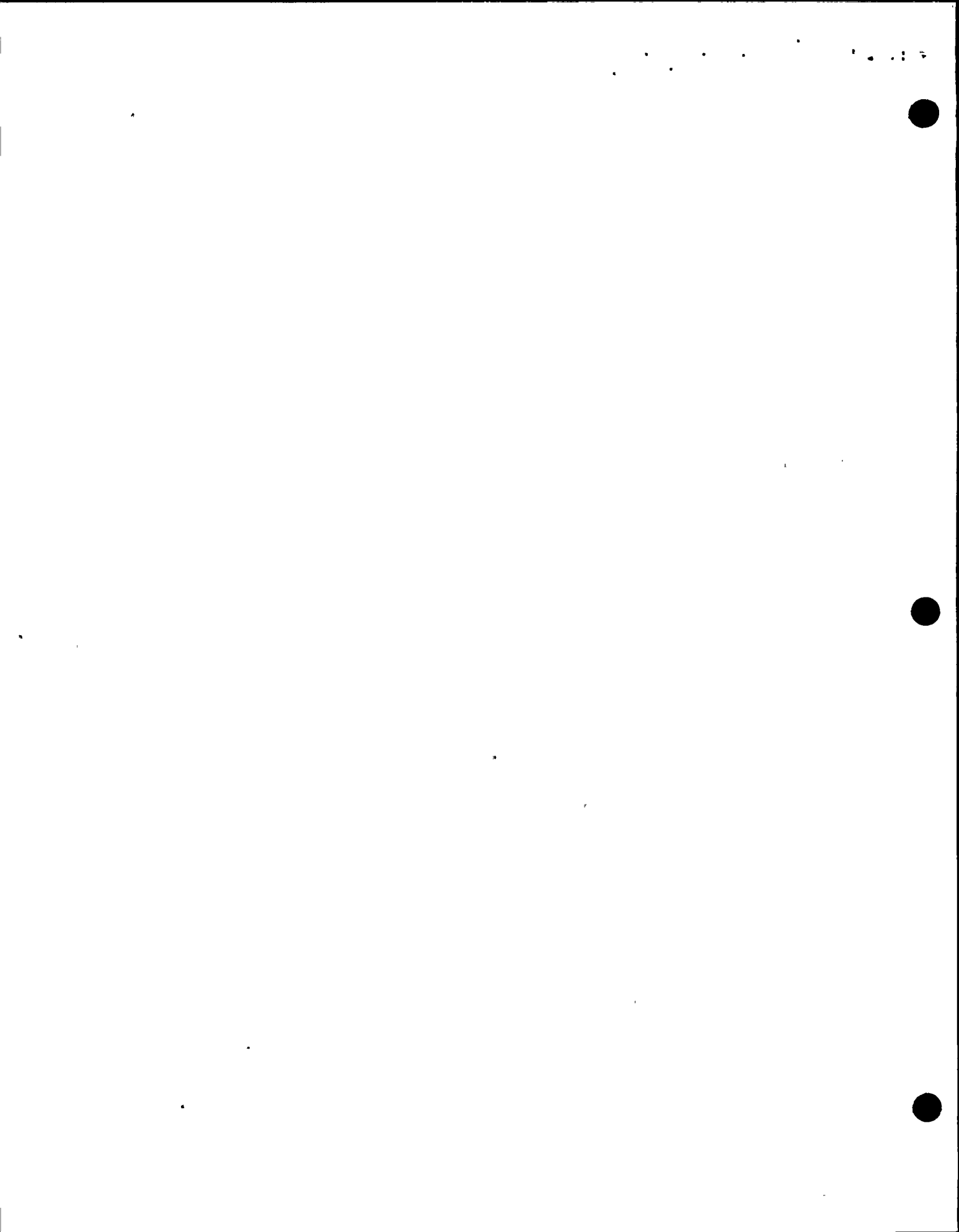
- A. Contrary to the Code of Federal Regulations in Part 10 CFR 70.3 a 0.5 gram 239-plutonium (beryllium) source was possessed without authorization by a current license following the termination of License No. SNM-1028 in 1969.

This item is a deficiency.

- B. Contrary to site procedures and policies developed in accordance with the technical specifications in section 6.8.1 and ANSI N18.7-1972 in section 5.1 an employee obtained a key from the Controller and left the key in the lock of an unattended gate to a high radiation area on July 16, 1975.

This item is a deficiency.

With respect to item B above the inspector noted that corrective action was taken before the close of the inspection.



U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION I

IE Inspection Report No: 50-220/75-12

Docket No: 50-220

Licensee: Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

License No: DPR-63

Priority: _____

Category: C

Safeguards Group: _____

Location: _____

Type of Licensee: 1850 MWt BWR (GE)

Type of Inspection: Routine - Radiological Protection

Dates of Inspection: July 16-18, 1975

Dates of Previous Inspection: June 25-27, 1975

Reporting Inspector: *K. E. Plumlee*
K. E. Plumlee, Reactor Inspector

8/12/75
DATE

Accompanying Inspectors: *P. J. Knapp*
P. J. Knapp, Senior Radiation Specialist

8-12-75
DATE

DATE

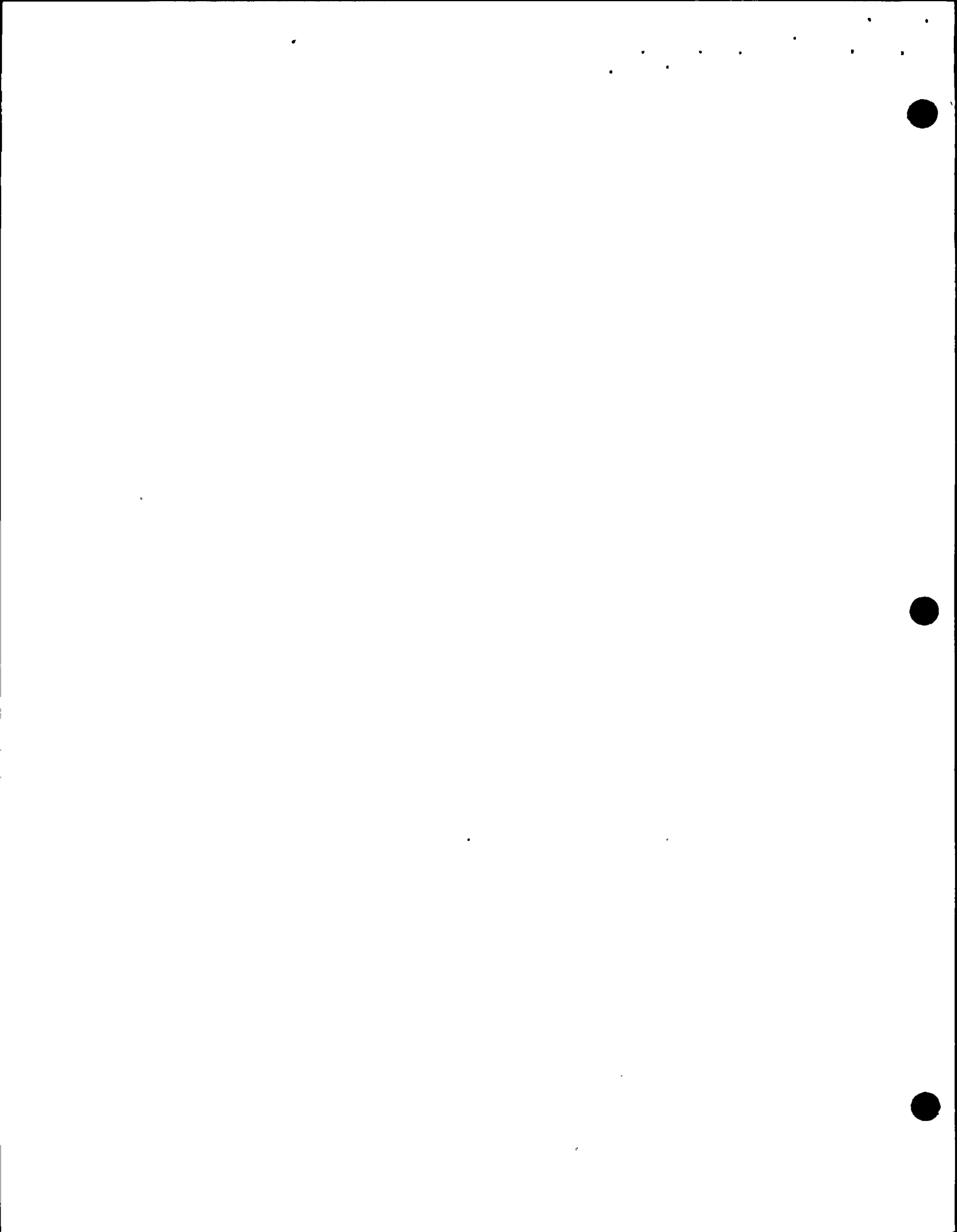
DATE

Other Accompanying Personnel: _____

DATE

Reviewed By: *P. J. Knapp*
P. J. Knapp, Chief, Facilities Radiation Protection Section

8/12/75
DATE



SUMMARY OF FINDINGS

Enforcement Action

A. Items of Noncompliance

1. Violations

None

2. Infractions

None

3. Deficiencies

- a. Contrary to 10 CFR 70.3 the licensee possessed a sealed source containing 0.5 grams of 239-plutonium apparently without authorization by a current license. (Details, 6)
- b. Contrary to site procedures and policies an employee left a key in the lock of an unattended gate to a high radiation area during the lunch period on July 16, 1975.

This noncompliance was promptly corrected by the licensee (Details, 8a)

B. Deviations

None

Licensee Action on Previously Identified Enforcement Items

A. Recording of Individual Exposures on RWP Records

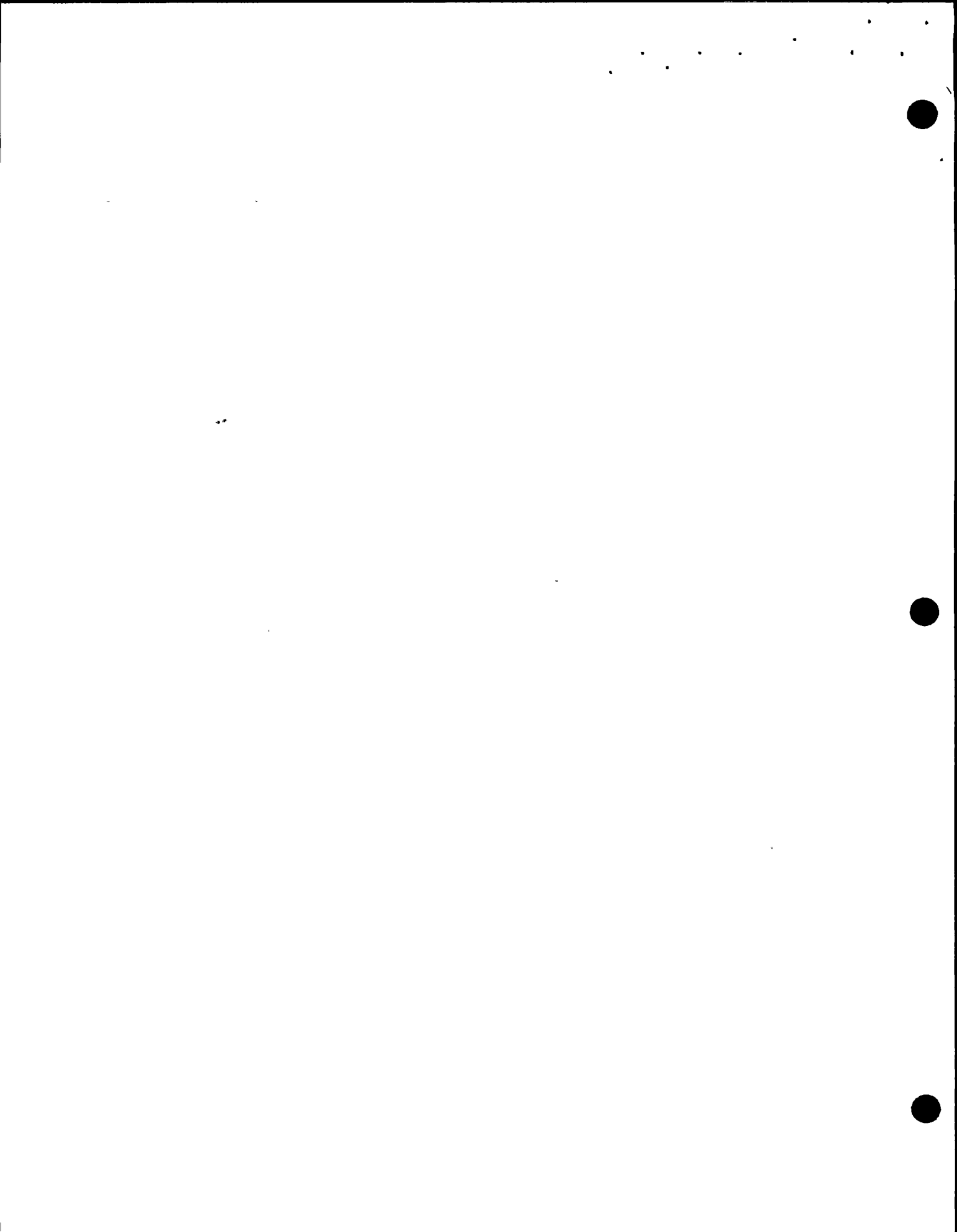
Inspection verified that all required entries were made on recent RWP forms. (Details, 4.e)

B. Step-off Pads at Exits from Contaminated Areas

Inspection during tours of the facility verified that appropriate step-off pads were provided. (Details, 8.c)

Design Changes

Not inspected.



Unusual Occurrences

None identified.

Other Significant Findings

A. Current Findings

1. Acceptable Areas

Inspection of work in progress, working conditions and equipment, and sampling of the licensee's records did not identify any non-compliance, deviation or unresolved item in the following areas.

- a. Licensee audits of radiological protection. (Details, 3)
- b. Use of instrumentation and equipment. (Details, 4)
- c. Receipt and transfer of materials. (Details, 7)
- d. Notification and reports. (Details, 5.c)

2. Unresolved Items

a. Purity of Piped Breathing Air

The licensee will document an evaluation of the purity of breathing air supplied by air compressors that are cooled by a contaminated water system. (Details, 8.a(e))

3. Infractions and Deficiencies Identified by Licensee

None

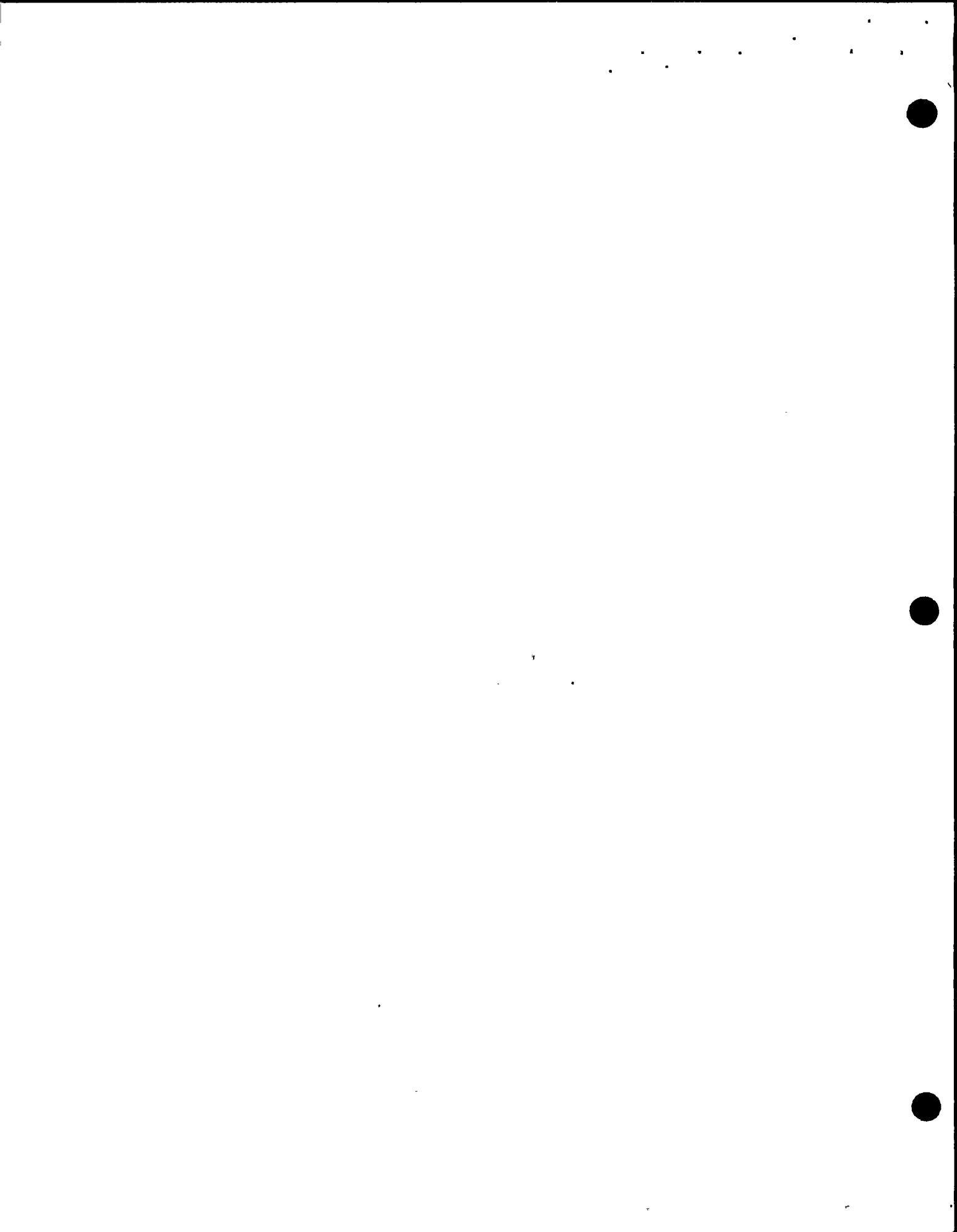
B. Status of Previously Unresolved Items

The following items are considered resolved.

1. Cleanup of contaminated areas (Details 8, and previous Inspection Report No. 50-220/75-04)
2. Appointment of Training Supervisor (Details 2, and previous Inspection Report No. 50-220/75-04)

Management Interview

A management interview was held at the site at the conclusion of the inspection on July 18, 1975.



Persons Present

T. Lempges, General Superintendent Nuclear Generation
T. Perkins, Station Superintendent
M: Silliman, Results Supervisor
E. Leach, Assistant Radiochemistry and Radiation Protection Supervisor

Items Discussed

A. Purpose and Scope of the Inspection

The inspector stated that this was an inspection of radiological protection at the Nine Mile Point 1 Station.

B. Items of Noncompliance

The items of noncompliance were identified as shown under Enforcement Action in the Summary of Findings of this report*. (Details, 6 and 8a)

C. Unresolved Items

1. Licensee's Evaluation of the Safety of the Piped Breathing Air Supply

The licensee's stated evaluation of the safety of the breathing air supply was discussed. (Details, 8b)

The inspector stated that this matter was unresolved. A written evaluation will be made by the licensee to fully substantiate the safety of the breathing air supply*.

D. Previously Unresolved Items

1. Operation of the New Liquid Waste Evaporator

The licensee's experience with the new evaporator and plans to remove the old evaporator were discussed. (Details, 9)

2. Cleanup of Contaminated Areas

The licensee's progress in cleaning up contaminated areas was discussed. (Details, 8)

3. Training Supervisor

The availability of the Training Supervisor was discussed. (Details, 2.a)

*Noncompliances and unresolved items were followed up by a telephone call on July 21, 1975 (Plumlee to Lempges and Burns).



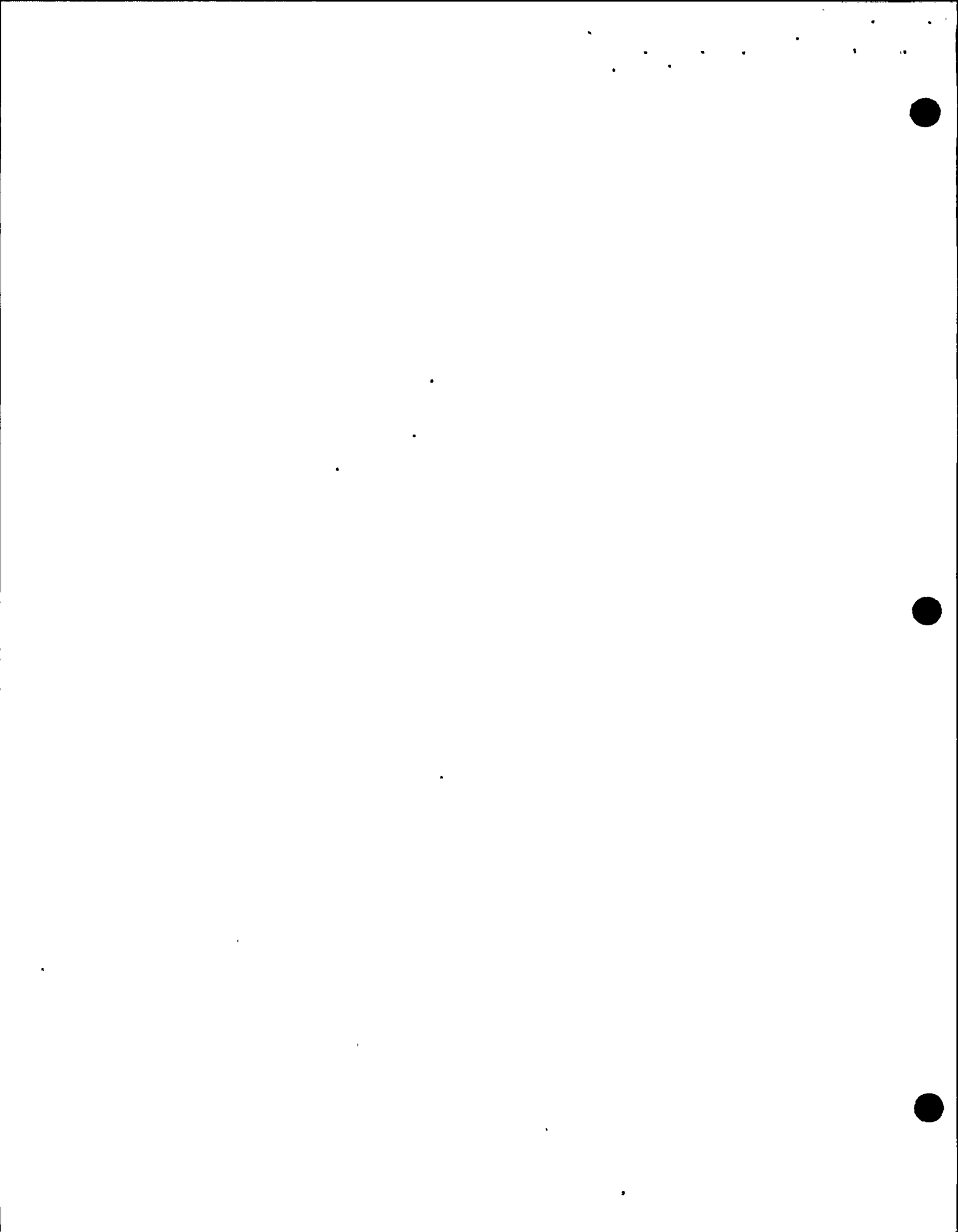
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E. Acceptable Areas

Items shown under Current Findings - Acceptable Areas of this report were discussed.

F. Changes to Chapter 10 of the Code of Federal Regulations (10 CFR)

The April 30, 1975 issue of Chapter 10 CFR was discussed including the need to update posted copies, availability of form NRC-3, and the statement on non-discrimination in part 10 CFR 19.32.



DETAILS

1. Persons Contacted

The following persons were contacted during this inspection.

- L. Bollin, Instrument and Control Supervisor
- W. Bryant, Quality Control Supervision
- D. Dise, Manager, Quality Assurance
- B. Eastman, Reactor Analyst Technician
- C. Gerber, Reactor Operator
- J. Gray, Radiochemistry and Radiation Protection Technician
- E. Leach, Assistant Radiochemistry and Radiation Protection Supervisor
- T. Lempges, General Superintendent Nuclear Generation
- T. Perkins, Station Superintendent
- M. Silliman, Results Supervisor

2. Staffing

a. Training Supervisor

The Technical Specifications in section 6.4.1 state that a training program shall be maintained under the supervision of a Training Supervisor.

Inspection Report No. 50-220/75-04 reported that the position was vacant (April, 1975).

The licensee stated during this inspection that Mr. John Aldrich was phasing out of his present duties with Quality Control to fill the Training Supervisor position commencing during July.

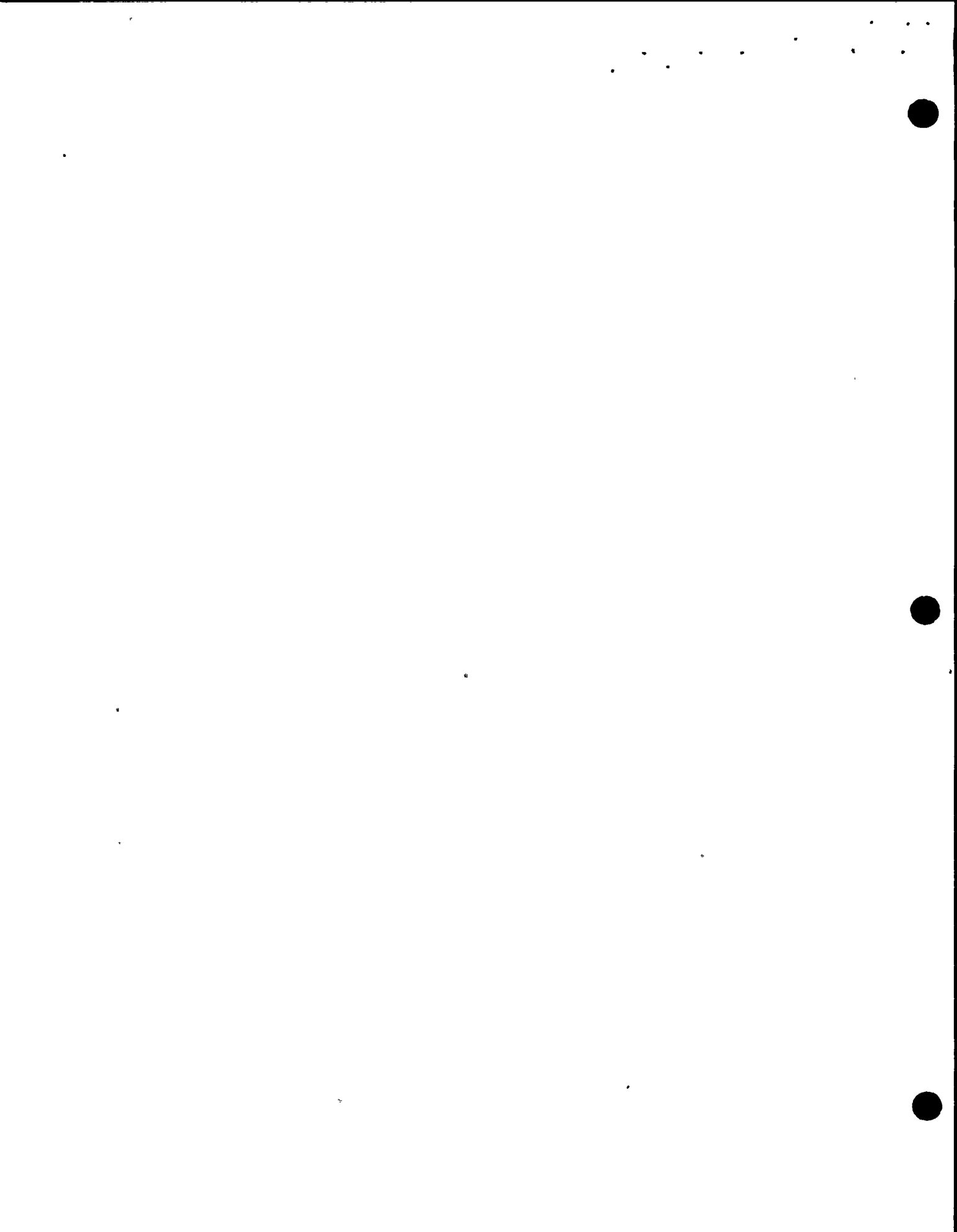
The inspector stated that he had no further questions on the above matter at this time.

3. Licensee Audits

Part of the inspection effort was to verify the licensee's compliance with technical specifications, section 6.5 "Review and Audit", and Quality Control Manual sections 3.5 and 3.6.

The following documents were inspected. No audit problem was identified.

- a. Radiochemistry and Radiation Protection Supervisor's in-plant audit survey report, dated November 15, 1974.



- b. Site Operations Review Committee (SORC) meeting minutes (56 meetings during January through May, 1975).
- c. Safety Review and Audit Board (SRAB) meeting minutes (6 meetings during January through July 2, 1975).
- d. Environmental Analysts, Inc. audit reports dated June, 1973 and August, 1974.
- e. Computer tabulation of individual exposures (recent periodic updates).

4. Licensee's Use of Instrumentation and Equipment

Part of the inspection effort was to verify the availability of instruments and equipment, the calibration and use of instruments, the performance of surveys, the monitoring of personnel exposures, and the evaluation of information by the licensee.

The following items were inspected. No problems were identified.

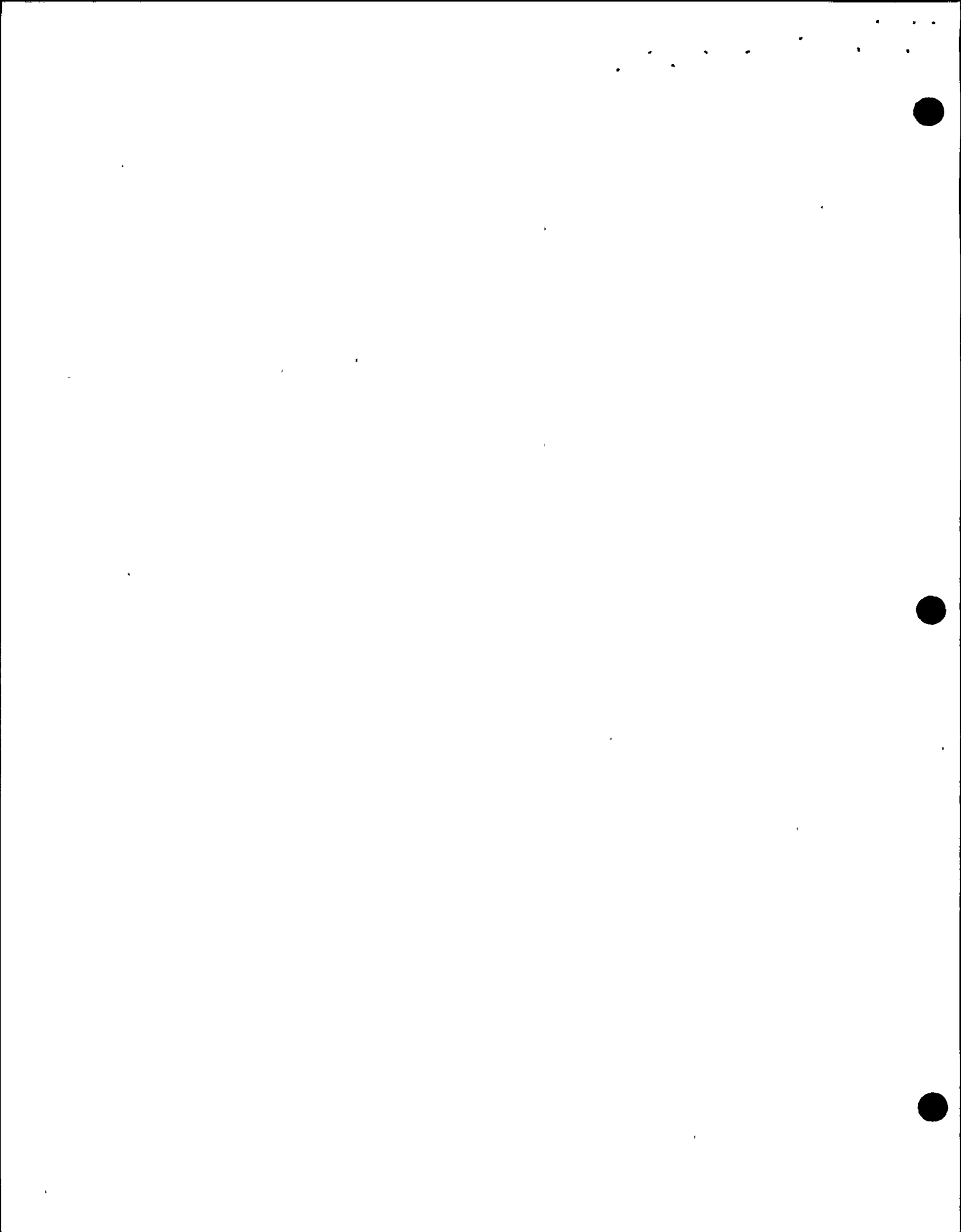
- a. Calibration and maintenance records of 57 survey instruments.
- b. Procedures (S or N) RTP-8 through 31 for calibration and use of radiation instruments.
- c. Observation of facility equipment, signs and tags.
- d. Observation of work in progress.
- e. Comparison of levels measured during inspection with signs, tags, RWP's and other records.
- f. Film badge exposure printout (Service Co.).
- g. Computerized printouts of individual exposure histories shown by dosimeter, film badge and TLD records.
- h. Computerized analysis of variations between dosimeter, film badge and TLD results.

5. Materials Inventory

The inspection effort was to verify the licensee's possession and use of radioactive materials in accordance with the license.

The following records were inspected. An item of apparent noncompliance was identified by the inspector as described by paragraph 6, below. No other problems were identified.

- a. Inventory and leak test records for sealed sources.
- b. Licensee's license files.
- c. Licensee's files of notification and reports.



6. Possession of SNM Source after Termination of Applicable License

Inspection identified a 0.5 gram 239-plutonium (Pu-Be) sealed source possessed by the licensee without apparent authorization by a current license.

The source appeared to have been obtained under license no. SNM-1028 which was terminated on issuance of license no. DPR-17.

The inspector identified the possession of the Pu-Be source as an apparent noncompliance with 10 CFR 70.3.

The licensee stated that immediate application would be made to authorize possession of the source.

The above item will be followed up on a subsequent inspection.

7. Receipt and Transfer of Materials

Part of the inspection effort was to verify the licensee's receipt and transfer of radioactive materials in accordance with regulatory requirements.

Recent receipts were for refueling purposes. Fuel receipts and storage were documented in accordance with the licensee's written procedures and the regulatory requirements.

No spent fuel shipments had been made to date.

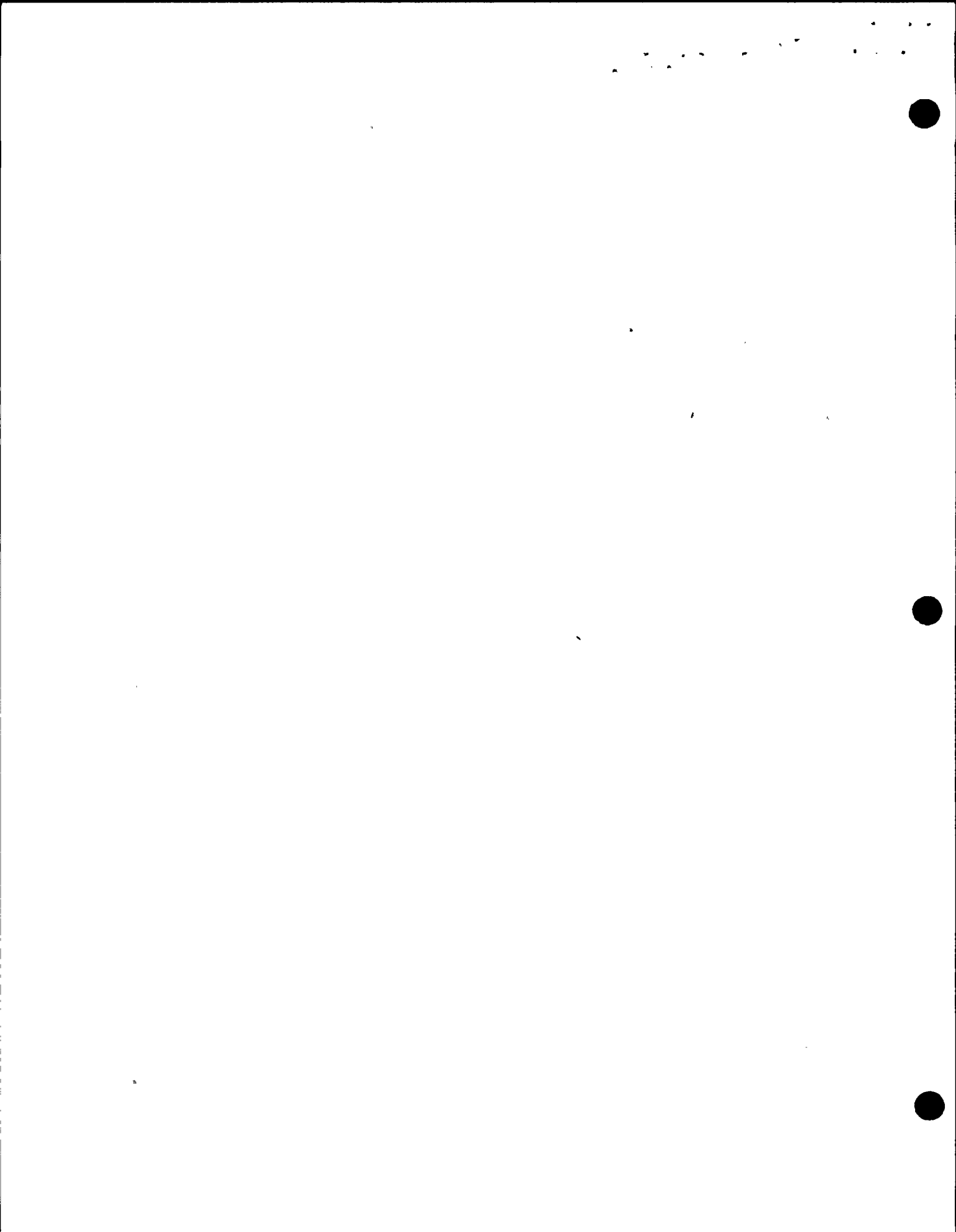
No problem was identified with regard to the receipt and transfer of fuel.

8. Facilities and Equipment

A tour of the station was made in order to inspect facilities and equipment. One apparent item of noncompliance and one unresolved item was identified (items a and b below). No other problems were identified.

a. Key in Unattended Gate to High Radiation Area

Technical specifications section 6.8.1 requires procedures and administrative policies that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972. Section 5.1 under "Procedure Adherence" states that "procedures shall be followed...", and under "Equipment Control Procedures" that procedures shall require control measures such as locking



or tagging to secure and identify equipment in a controlled status.

Contrary to the above, on July 16, 1975 an inspector found a key in the lock of an unattended gate to a high radiation area. Discussion indicated that the key had been issued by the Controller to a markup man working during the morning who then left the key for the markup man due after lunch. The latter took charge of the key promptly when he arrived.

The inspector identified the above item as a noncompliance with the licensee's control measures referenced above, as incorporated into site procedures and policies.

The licensee stated that control of locked gates would be re-emphasized.

b. Unresolved Item - Purity of Breathing Air Supply

Inspection indicated that breathing air is piped from compressors which are cooled by a contaminated water system* and that residual activity is suspected in the water side of intercoolers and aftercoolers through which the air passes. The inspector noted that although there is no known interconnection between the cooling water and the breathing air an evaluation of the maximum possible effect on breathing air in the event of a leak should be made.

The licensee's monthly and quarterly surveillance checks of breathing air outlets and air compressor blowdown were negative for contamination, however there was some question regarding the degree to which these checks provide quantitative information.

The licensee discussed additional factors supporting the safety of the supply system.

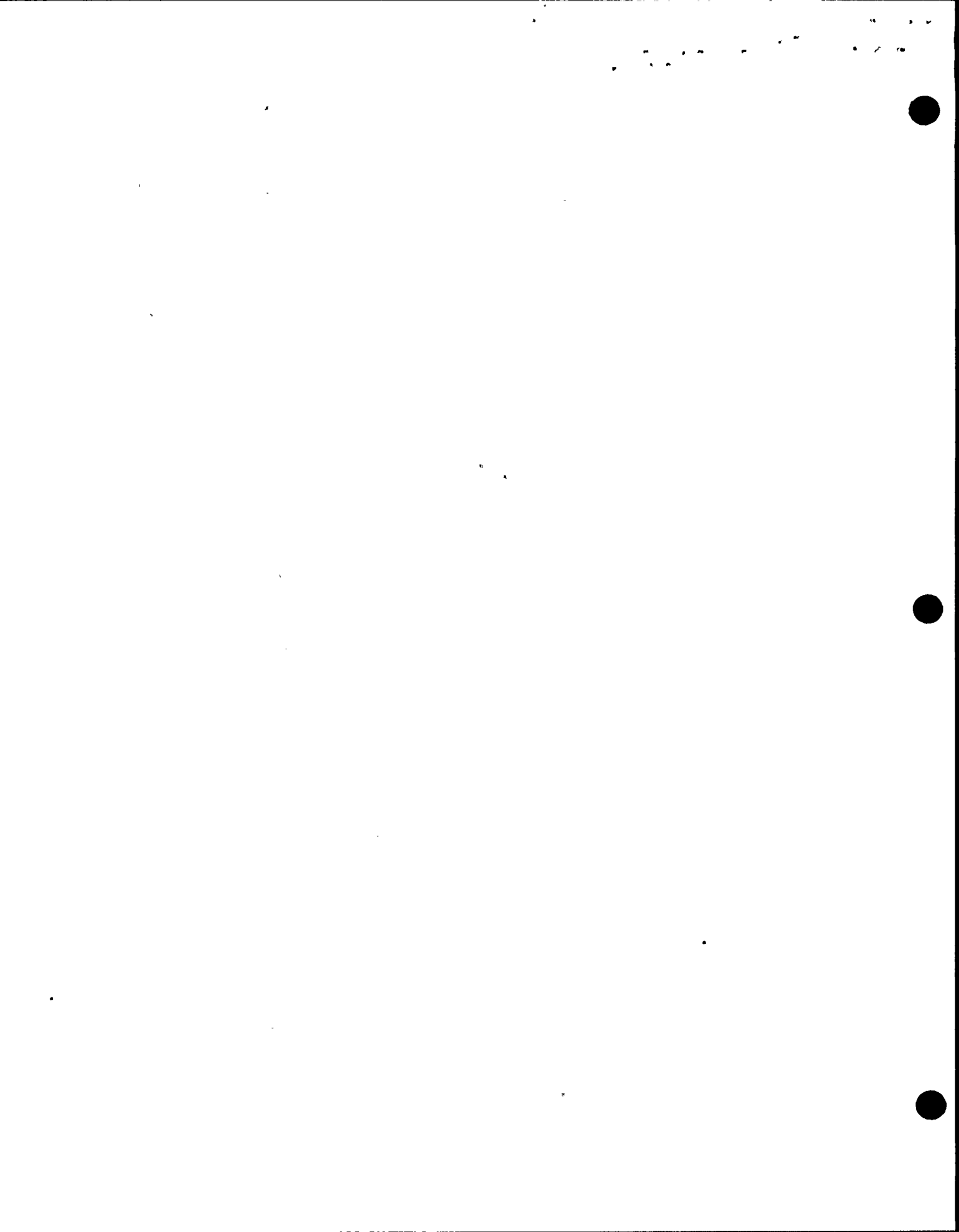
The inspector identified this matter as unresolved. (Management Interview, item C).

This item will be followed up on a subsequent inspection.

c. Acceptable Areas

Change rooms
Decontamination areas
Area access locations, and stepoff pads
Radiation work and RWP documentation
Laboratory area
Previously contaminated areas
Posted information (Management Interview, item f)

*Reactor Building Closed Cooling Water System - currently reported activity is 8×10^{-4} microcuries/milliliter.



9. Liquid Waste Evaporator

The new evaporator is in service. The licensee's preoperational tests and review and acceptance of this equipment is documented.

Discussion indicated that the licensee raised the temperature of the distillate in order to reduce conductivity of the distillate (currently about 50 micro-mohs/cm). Presence of a moderately volatile organic material is suspected. The licensee is following up on this problem.

The old evaporator is to be removed.

The inspector stated that he had no further questions on this matter at this time.

10. Auxiliary Steam System

The licensee stated that the only auxiliary steam available at the facility was in the radwaste building, and that electric heat was used throughout the facility for space heating. The licensee's stated evaluation was that there is no hazard of spreading contamination through the auxiliary steam systems to other parts of the facility.

The inspector stated that he had no further questions on this matter at this time.

2-A