

APPENDIX A

NOTICE OF VIOLATION

Niagara Mohawk Power Corporation

Docket No. 50-220

Based on the results of an NRC inspection conducted on August 28-31, 1978, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC License No. DPR-63 as indicated below. Items A, C, and D are infractions and item B is a deficiency.

- A. A requirement of Technical Specifications Section 6.3.1 is that each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, for comparable positions. Section 4.5.2 of ANSI N18.1-1971 requires that technicians in responsible positions shall have a minimum of two years of working experience in their specialty.

Contrary to the above, four technicians were assigned responsible positions in the Radiochemistry and Radiation Protection organization involving the evaluation of radiological hazards and the issuance of Radiation Work Permits who did not have the required minimum of two years of working experience in their specialty. These assignments became effective commencing October, 1977, for two individuals and commencing April, 1978 for the other two individuals.

- B. A requirement of Technical Specifications Section 6.11 is that the procedures for personnel radiation protection shall be adhered to for all operations involving personnel radiation exposure.
1. Section 2.4.5 of procedure S-RTP-50 requires a six month calibration interval for self-reader dosimeters that are used for personnel dose measurements.

Contrary to the above, on August 31, 1978, two dosimeters, Nos. 701088 and 250968 were held for use by individuals and had not been calibrated for twelve months or more.

2. Section III F. of the station radiation protection procedures requires that some of the smears taken in the station will be periodically counted for alpha activity and that the alpha activity should be less than 10 dpm/100 cm<sup>2</sup> as determined by disc smears.

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Contrary to the above, no such counting was performed between January 1, 1978 and August 28, 1978.

- C. A requirement of Technical Specifications Sections 4.6.5 and 3.6.5 is that each radioactive sealed source shall be leak-tested at intervals not to exceed six months and that the tests be capable of detecting the presence of 0.005 microcuries of radioactive material in the test sample.

Contrary to the above, the 0.5 gram Pu plutonium-beryllium source was not tested so as to detect the potential presence of 0.005 microcuries of plutonium in the test sample at any time between January 1 and August 30, 1978.

- D. Technical Specification Section 6.13.1b requires that locked doors shall be provided to prevent unauthorized entry into High Radiation Areas in which the intensity of radiation is greater than 1,000 mrem/hr.

Contrary to the above at 6 p.m. on August 28, 1978, the gate on the 261 ft. elevation of the turbine building nearest to door No. 56, controlling an area wherein the radiation intensity was greater than 1,000 mrem/hr, was unlocked and unattended.

