

**NIAGARA
MOHAWK**

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

January 29, 1979

Mr. George H. Smith, Chief
Fuel Facility and Materials Safety Branch
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

RE: Docket No. 50-220
Inspection Report 78-20

Dear Mr. Grier:

This refers to the inspection conducted by Mr. L. Thonus of your office on November 27-29, 1978, at the Nine Mile Point Nuclear Station Unit #1. The following item of non-compliance was cited:

Technical Specification (TS) 6.11, "Radiation Protection Program" requires that "procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure."

Procedure RP-2, Radiation Work Permit Procedure (dated September, 1978), developed pursuant to TS 6.11, requires in Paragraph 4.6 that the radiation protection technician enter the remaining authorized exposure during the calendar quarter on the Radiation Work Permit (RWP) for each individual selected to work on the job. Paragraph 5.8 of Procedure RP-2 requires that individuals added to the work force review their exposure authorization with a radiation protection technician and that the review be recorded by entering the remaining authorized radiation exposure when signing in on the RWP.

Contrary to the above requirements, exposures other than actual remaining authorized exposures were entered for two individuals working under RWP No. 8973, dated October 31, 1978, and one individual working under RWP No. 9072, dated November 14, 1978.

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RESPONSE

In 1978, a new Radiation Work Permit Procedure was issued to provide additional guidance to personnel working in areas where radioactive materials and radiation field are present. In particular, the Time and Exposure Log was modified to require recording of delta authorized exposure, that is, the difference between the exposure already received for a calendar quarter, and that currently authorized for an individual. This is merely a recording of the result of the mental process a worker normally goes through any time he enters a radiation work area, i.e., "How much more exposure can I receive?"

In addition to distribution of controlled copies of the Radiation Protection Procedures, training was held as follows:

9/25	2 shifts of operators
9/29	2 shifts of operators
10/10-11-12-13	- Miscellaneous plant personnel
10/11-12	Radiation Protection personnel
10/30	Make-up session

More than 90% of the station personnel attended these sessions.

After implementation, October 16, 1978, an Assistant Radiochemistry and Radiation Protection Supervisor monitored RWP issue and procedure fulfillment continuously for the first week, and intermittently thereafter.

The two individuals who signed in on RWP #8973 had missed the training sessions held prior to implementing the revised procedure. These persons were interviewed by the Radiochemistry and Radiation Protection Supervisor at the time of the inspection and were knowledgeable in the requirements of the procedure as of that date.

The individual working on RWP #9072, who signed in using 100 mrem delta authorized exposure, did so at the direction of the Radiochemistry and Radiation Protection Supervisor. This is not a violation of procedure because the procedure does not specify, and was not intended to specify, the method to calculate delta authorized exposure for an individual who does not yet appear on the radiation exposure report. (A person will not appear on the report until he has received radiation exposure during this visit to Nine Mile Point.)

The provision to enter a delta authorized exposure other than that calculated in accordance with procedure paragraph 4.6, and other changes based on the experience gained in three months usage of the revised procedure, will be included in a revision prior to March 1, 1979.

Due to the extent of revision, and the number of station personnel using the Radiation Work Permit Procedure, special training sessions and supervisor monitoring was performed when this procedure was issued.



Since reasonable training and monitoring was performed, it is considered that full compliance has been achieved. The procedure revision planned will serve to clarify the requirements so as to avoid further items of non-compliance.

Sincerely yours,



R.R. Schneider
Vice President -
Electric Production

EWL/mtm



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