

October 19, 1979

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

REF: Docket No. 50-220
Inspection Report 79-22

Dear Mr. Brunner:

This refers to the inspection conducted by Mr. R. Architzel of your office on August 21-24, 1979, at the Nine Mile Point Nuclear Station Unit 1. The following is submitted in response to the alleged infraction detailed in Appendix A of your letter dated September 28, 1979.

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

- Procedure RP-2, Radiation Work Permit Procedure, states in Section 5.2, that, "... the leadman is responsible for familiarizing personnel with all the instructions on the permit, and insuring that these instructions are strictly followed...."
- Procedure RP-1, Access and Radiological Controls, states in Section 4.3.3, that, "...Radiation areas should be entered only when necessary to perform a specific job. When entered, time spent in the area should be kept to a minimum..."

Contrary to the above, on August 23, 1979, a worker was observed in a posted Locked High Radiation Area (Reactor Building Basement, 237 elevation) and contaminated area, lying down on a table (actual radiation level 10 mrem/hr) with street clothes on. The applicable Radiation Work Permit Number 6442, dated August 23, 1979, issued to repair restraints for the Torus/Drywell Vacuum breakers, required the wearing of coveralls and liners (for the hands) in this area.

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RESPONSE

The contractor worker was immediately terminated for failure to follow rules and regulations. In addition, the contractor immediately notified the local union business agent of the requirement to follow rules and regulations at all times. The letter further stated that the worker "had been properly and thoroughly briefed prior to the start of his employment at Nine Mile and had to be aware that you do not linger in a radiation area. Whenever you enter a radiation area, it is for work and then OUT! This is for his personal safety".

The policy of disciplining personnel for failure to follow procedure will be continued, and has been applied to company personnel as well as contractors.

An analysis of the underlying cause of the tendency to short-cut procedure adherence has been undertaken to determine the areas in which action can be taken. The following items have been identified, and will be addressed as indicated:

1. The subject of radiation safety is not addressed on a frequent enough basis to keep it foremost in the minds of plant personnel.

To counteract this, the regular monthly department safety meetings will periodically be devoted to radiation safety, and include discussions of RWP requirements, radiation monitoring, use of the Radiation Exposure Reports, and a question and answer session. The first of these meetings was held with plant electricians in mid-September. Remaining departments will be included, by the end of the year, in a rotating schedule.

2. On-the-job inspections by supervisors have not always been carried out by supervisors complying fully with the requirements of the RWP in effect. For example, shoe covers alone are only adequate for entry into an area if specifically permitted by the RWP.

The safety meetings described above will include supervisors, and will specifically address the requirement for supervision to set a proper example of adherence to procedure.


3. In-plant checks on procedure adherence are not performed often enough.

The functions of the Radiochemistry and Radiation Protection Department have been analyzed to determine in what manner the audit of RWP compliance can best be accomplished. A job specification addressing Dosimetry, Audit and ALARA functions is now under corporate review. This position is intended to consolidate functions, now partially addressed by several individuals, in order to devote full time attention to this area.

Although elimination of some complexity from the RWP procedure would result in fewer violations of procedure, there is no justification for doing so just to improve the compliance score card. Changes to clarify requirements and minimize confusion will be considered as long as no loss of quality results.

The implementation of the above items, by December 31, 1979, will result in improved adherence to procedure in order to avoid further items of non-compliance.

Very truly yours,


R.R. Schneider
Vice President -
Electric Production

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