

December 21, 1979

Mr. Boyce H. Grier, Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

SUBJECT: Inspection No. 50-220/79-20; 79-25

This refers to the inspection conducted by Messers. L. Thonus, G. Yuhas, and F. Costello of your office on June 21-22, and September 25-28, 1979, of activities authorized by NRC License No. DPR-63 and to the discussions of your findings held by Mr. Yuhas and Mr. Costello with Mr. Lempges and other members of our staff at the conclusion of the inspection. This also refers to the meeting held at our office on October 16, 1979 attended by Mr. Lempges, Mr. Leach and myself of our staff and by Mr. Allan, Mr. Stohr and Mr. Yuhas of your staff.

RESPONSES

A - Overexposure -

In the course of the NMPC investigation into the factors contributing to the overexposure, no single event could be determined as the cause of the overexposure. Several contributory items were identified in our letter of June 15, 1979. In particular, the computer dosimeter system error messages identified as desirable have been programmed and are now undergoing trial runs. These changes are designed to ensure proper dosimeter reading back-up by TLD readings.

Contractor employee supervision will be augmented by requiring an HP coordinator for contractors with more than a few persons working in High Radiation Areas. Such a coordinator is now being used for work involving Waste Building modifications.

During major outage periods the Radiation Protection supervisory staff will be augmented by contractor HP supervisors, who will be assigned on-the-job RWP audit functions.

B - Instructions to Workers -

To preclude re-occurrence, contractor supervisors will be instructed in more detail concerning escort and training requirements for persons working in the station. Although it is possible the individual was

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considered a "professional" radiation worker due to his status as a radiographer, this does not relieve NMPC of the responsibility to instruct workers, and this point will be made clear to all NMPC persons responsible for bringing contractors on-site prior to each outage.

C - 1. Radiation Area Access -

The individual in question was interviewed on the following day in the presence of his union steward to ascertain the facts of the case. Although the individual had worked through his normal afternoon break to complete assigned tasks, and had commenced a break at approximately 4:05 p.m., he was reprimanded for poor radiological practices. A letter was placed in his personnel file stating the facts of the incident.

2. Leadman Qualification -

Insufficient training led to the use of RWP's by individuals not qualified to be leadman. Since assignment to jobs is a supervisory function, the corrective actions outlined in our response to Item B will prevent re-occurrence of this infraction.

3. Authorized Exposure -

Since the individual who exceeded his authorized exposure was the individual who did not receive training, the corrective actions outlined in our response to Item B will prevent re-occurrence of this infraction.

4. RWP Instructions -

The RWP has become a complex instruction sheet, and it attempts to define and record accomplishment of many separate tasks. Although all functions listed on the RWP are required, it is possible that not all information requested of a worker is necessary, and it may not be desirable to record it on the RWP, in that it leads to confusion. During the first quarter of 1980 an analysis will be made of RWP audit (see General Comments) to determine what procedural changes may be made to minimize confusion.

The instructions contained on RWP's will be enforced by means of the RWP audit.

5. Contaminated Clothing -

An investigation into the reason for clothing apparently in excess of procedural limits being on shelves for use revealed that the method of measurement influences the reading. During the inspection, measurements were made of folded clothing; dose contributions from several sections of the clothing therefore contributed to the observed readings. After laundering, the clothing is monitored by passing the unfolded



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clothing over a detector, which allows a scan of all areas of the clothing. A garment uniformly contaminated to 2000 to 2500 c/m will indicate approximately 6000 when folded. It is to be expected, therefore, that readings on folded clothing may be in the range of 5000 to 9000 c/m and still meet procedural requirements.

The 15,000 c/m reading clearly indicates that an error was made. Retraining of laundry personnel, and daily checks of the laundry count rate meters have precluded a re-occurrence of this problem.

GENERAL COMMENTS

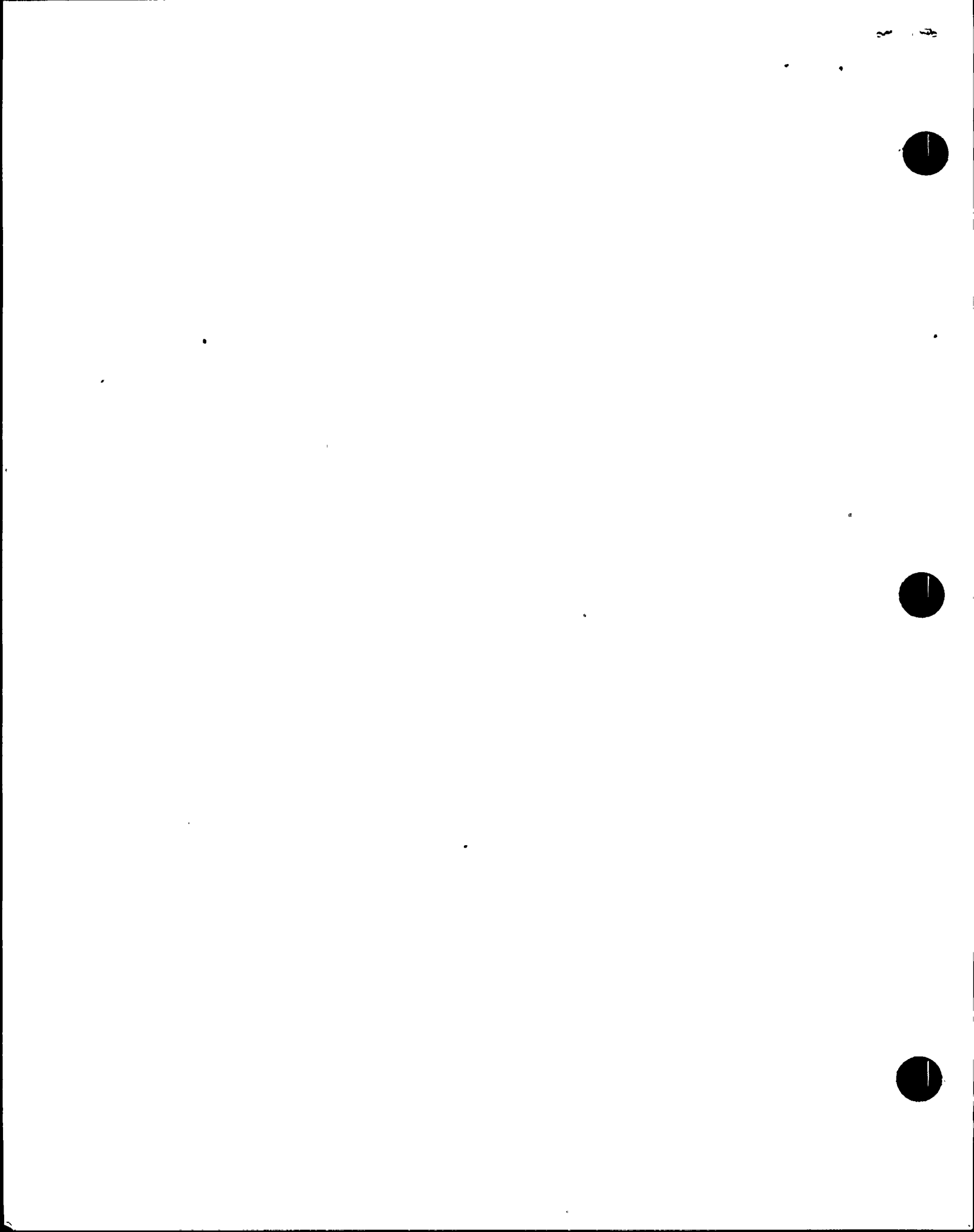
It is clear that the key to effective management control is implementation of a regular management audit function designed to identify and re-train, immediately, those persons who fail to follow procedure. The intermittent surveillance applied up to this time has been effective with respect to persons willing to follow procedures diligently, but only partially effective for those with a tendency to laziness.

As a part of the improved management controls, the supervisory training and auditing identified previously will be augmented.

In addition, persons added to the operations staff as Assistant Station Shift Supervisors will be required to include RWP audits with their general station surveillance. Reports of these audits will be kept on file for review.

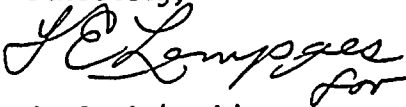
With respect to discussions held with NRC representatives on October 16, 1979, the radiation protection procedure concerns expressed will be addressed. We do not believe it will be possible to satisfy the concern expressed with regard to which persons are required to follow which requirements, however. For example, multiple respiratory requirements are often stated: full face mask for persons welding or grinding; half-face masks for all others. It is quite clear to persons on the job which requirements need to be followed. Historical auditing of who wore what face mask is unnecessary, and contributes nothing to minimizing exposure. Therefore, no change is contemplated with respect to this example, but the RWP audits will be used to identify potential procedure improvements, and actual compliance.

Personnel interviews are in progress to replace persons who have left the Radiochemistry and Radiation Protection Department. The additional supervision will increase audit capability.



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The actions identified here will serve to prevent future items of non-compliance.

Sincerely,


R. R. Schneider
Vice President
Electric Operations

RRS:jl

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