Central Files

NIAGARA MOHAWK POWER CORPORATION

NIAGARA MOHAWK

300 ERIE BOULEVARD, WEST
SYRACUSE, N. Y. 13202

November 9, 1976

Mr. James P. O'Reilly
Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

RE: Docket No. 50-220
I.E. Circular No. 76-03

Dear Mr. O'Reilly:

Your September 13, 1976 letter forwarded to us the I.E. Circular 76-03 which discussed radiation over-exposures occuring in reactor cavities at three nuclear stations, and requested action to be taken by all licensees.

In response to your requests, the following information is submitted:

REQUEST 1

"Perform a thorough review of plant areas and operations to identify high radiation areas, both continuous and transient, as defined in 10 CFR 20.202(b)."

RESPONSE

A thorough review of plant areas and operations was performed. High radiation areas throughout the plant are identified and posted per 10 CFR 20.203. In addition, a program has been established to mark "Hot Spots" within High Radiation Areas; these are areas at which the Whole Body radiation exposure rate differs significantly from the general area exposure rate.

REQUEST 2

"Verify that entryways into high radiation areas are conspicuously posted and locked or otherwise controlled in such a manner as to explicitly identify the nature of the hazard, appropriately control entry, and require adequate pre-entry surveys."

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RESPONSE 2

All areas are properly marked and controlled in accordance with the J.A. FitzPatrick/Nine Mile Point Radiation Protection Procedures. In particular, these procedures implement the requirements for posting and control specified in 10 CFR 20.203. Work activities in High Radiation Areas require, by these procedures, a Radiation Work Permit prior to beginning work in the area. This procedure identifies explicitly the hazards involved at the time work is to be accomplished. These hazards are then listed on the RWP, which remains at the entry point while work is in progress. The only exception to the requirement for an RWP survey to be performed by a Radiation Protection Technician is in the use of the Extended Radiation Work Permit procedure. This procedure allows persons qualified to SelfMonitor to enter High Radiation Areas, while continuously monitoring, up to a limit of 2500 mr/hr. This procedure is used primarily by Operators and Technicians in the course of routine work; specific RWP's are required for nonroutine operations, and for all operations where dose rates may exceed the SelfMonitoring limit.

REQUEST 3

"Ensure that radiation protection procedures and radiation protection training and retraining programs specifically address the matter of control of and access to such areas and initiate appropriate re-training of all plant personnel."

RESPONSE 3

In order to be permitted unescorted access within the Station, a person must be qualified in radiation protection. In order to qualify in radiation protection, the person must attend a training class which specifically addresses the matter of control of and access to restricted areas, radiation areas and high radiation areas. The person must pass a comprehensive examination based on the JAF/NMP Radiation Protection Procedures to demonstrate the required level of qualification. In addition, the person must be re-trained and re-examined per Administrative Procedure AP-21D, General Employee Training, in order to continue his unescorted status. This status is indicated by a color-coded pictured ID badge system governed by AP-4A.

An individual not qualifying in radiation protection must be accompanied by an escort who is qualified at all times he is within the Restricted Area, including Radiation Areas and High Radiation Areas.

REQUEST 4

"Ensure that the procedures governing personnel entry into all actual or potential high radiation areas permit such entry only after appropriate management review and approval so that conditions within the area are known and not subject to change while the area is occupied."

RESPONSE 4

Plant surveillance procedures, which require Technician or Operator access to High Radiation Areas, include the requirement to obtain Station Shift Supervisor permission prior to performing the test. In addition, use of the Extended Radiation Work Permit requires notification of the control room operator, who is cognizant of all station paramters, prior to entry into High Radiation Area.

For maintenance and other entries not authorized under the Extended Permit, an RWP must be obtained from Radiation Protection. The Station Shift Supervisor is the management person responsible for review and approval of the work to be performed, area to be entered, and Mark-up man assigned to the job. The Mark-up man is the person designated to exercise control over each individual entry to the job site.

The Traversing In-Core Probe (TIP), within the drywell area and TIP drive room is recognized as potentially producing variable high radiation areas. Drywell entry is governed by Radiation Protection Procedures. In addition, the TIP system operation is governed by Operating Procedure #39, which specifically addresses the requirement to "make sure that no persons are in the area of the probe guide tubes in the drywell or the TIP drive room".

In order to supplement the existing Area Radiation Monitoring System, additional radiation monitors have been ordered to be used in appropriate locations. These monitors have built-in alarms which may be set to give warning of a change in radiation levels.

Very truly yours,

ORIGINAL SIGNED BY R.R. SCHNEIDER

R.R. Schneider
Vice President -
Electric Production

EWL/mtm

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

October 1, 1976

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

Docket No. 50-220

Gentlemen:

The enclosed Circular No. 76-04 is forwarded to you as a matter concerning a possible generic problem relating to reactor safety systems and components.

Any questions regarding this Circular should be directed to this office.

Sincerely,

Robert T. Carlson
for James P. O'Reilly
Director

Enclosure:
IE Circular No. 76-04

cc: T. E. Lempges, General Superintendent, Nuclear Generation
T. J. Perkins, Station 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)

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