

APPENDIX B

ITEMS OF NONCOMPLIANCE

Based on the inspection conducted on September 29-October 10, 1980, certain licensee activities appear to have been in noncompliance with NRC requirements, as noted below. These items are infractions.

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

- a. Procedure No. N-RTP-45, "Whole Body Counter System," Revision 1, Section 2.4.1, states that "Whole body counting for site personnel will be scheduled 3 times a year and every effort will be made to count each regularly assigned site person at least twice a year."

Contrary to the above, a review of the whole body count records for the onsite technicians and supervisors in the Radiochemistry and Radiation Protection Department (RRPD) revealed that approximately 75% of the RRPD personnel had not been whole body counted within the past two years.

- b. Procedure RP-2, "Radiation Work Permit Procedure" specifies the limitations for areas requiring entry under a Radiation Work Permit (RWP).

Contrary to the above, on October 2, 1980 a Security Guard entered the Reactor Building Spent Fuel Area. The area required a RWP for entry. The Security Guard was not on a RWP for the area nor was the guard qualified as a Self Monitor.

- c. Procedure RP-1, "Access and Radiological Control," Section 8.1 states "Certain personnel other than radiation protection technicians are trained to perform basic radiation and contamination monitoring. These personnel are permitted to monitor for themselves within the following limits.

- (1) Beta-gamma radiation monitoring up to 2500 mrad/hr.

- (2) Beta-gamma contamination surveys up to 25,000 c/m. per square foot, or 25,000 dpm/100 cm²."

Contrary to the above, on October 2, 1980 a Self Monitor entered the Reactor Building Spent Fuel Area on an Extended RWP. The previous routine survey of the area, dated September 22, 1980, indicated contamination levels of 30,797 and 48,582 dpm/100 cm², these levels exceed the limits for self monitors.

