

NIAGARA MOHAWK POWER CORPORATION



300 ERIE BOULEVARD WEST  
SYRACUSE, N. Y. 13202

THOMAS E. LEMPGES  
VICE PRESIDENT—NUCLEAR GENERATION

**IE HQ FILE COPY**

November 19, 1981

Mr. Ronald C. Haynes  
Director  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA. 19406



RE: Docket No. 50-220  
File No. IAL-80-35

Dear Mr. Haynes:

In accordance with Item #1 of the referenced Immediate Action Letter, we are hereby submitting an Action Plan Progress Report for the month of October, 1981.

1. Action Plan Section I - Radiation Protection Organization: A) H.P. Management Staffing; B) Technical Support Staffing  
Section II.A and II.B - Personnel Selection and Qualification Criteria

In reviewing previous progress reports, it was determined that we have not reported progress in production of Position Analysis Questionnaires and Detailed Job Descriptions since our June report (our letter of July 8, 1981). In order to post the new management and technical support positions, brief job summaries (or drafts of PAQ's) were produced so that personnel could be hired. On the basis of the new or existing PAQ's, existing Job Descriptions, and the concerns expressed in Inspection Report 80-10, updated PAQ's and Detailed Job Descriptions are now being drafted. Initial drafts for 7 of 12 departmental supervisory positions were submitted for Site review October 22, 1981. This includes 5 "old" (prior to October 1980) and 2 "new" positions. It is intended now to complete PAQ's for the remaining positions during the month of November so that the remaining Detailed Job Descriptions may be completed in December. It is intended to finalize all of these at very nearly the same time so that they may be reviewed (December 1981 to January 1982) to eliminate unintentional duplication or omission of functions. This schedule is consistent with Items II.A and II.B.

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2. Action Plan Section I.D - Clerical Staffing

Although the Plant Operating Clerk job specification does not address specific knowledge necessary to perform the Radiation Records work, it does include the most complex recordkeeping required in a steam-electric generating station. Therefore, no revision to the job specification will be made at this time.

In order to ensure continuity in these operations, the number of personnel and the level (B,C, or D) necessary is again under evaluation, and will be reported next month.

3. Action Plan Section II.C - RP Organization Long Term Training  
Section II.A and II.B - Personnel Selection and Qualification Criteria  
Section I.C - Technician Staffing

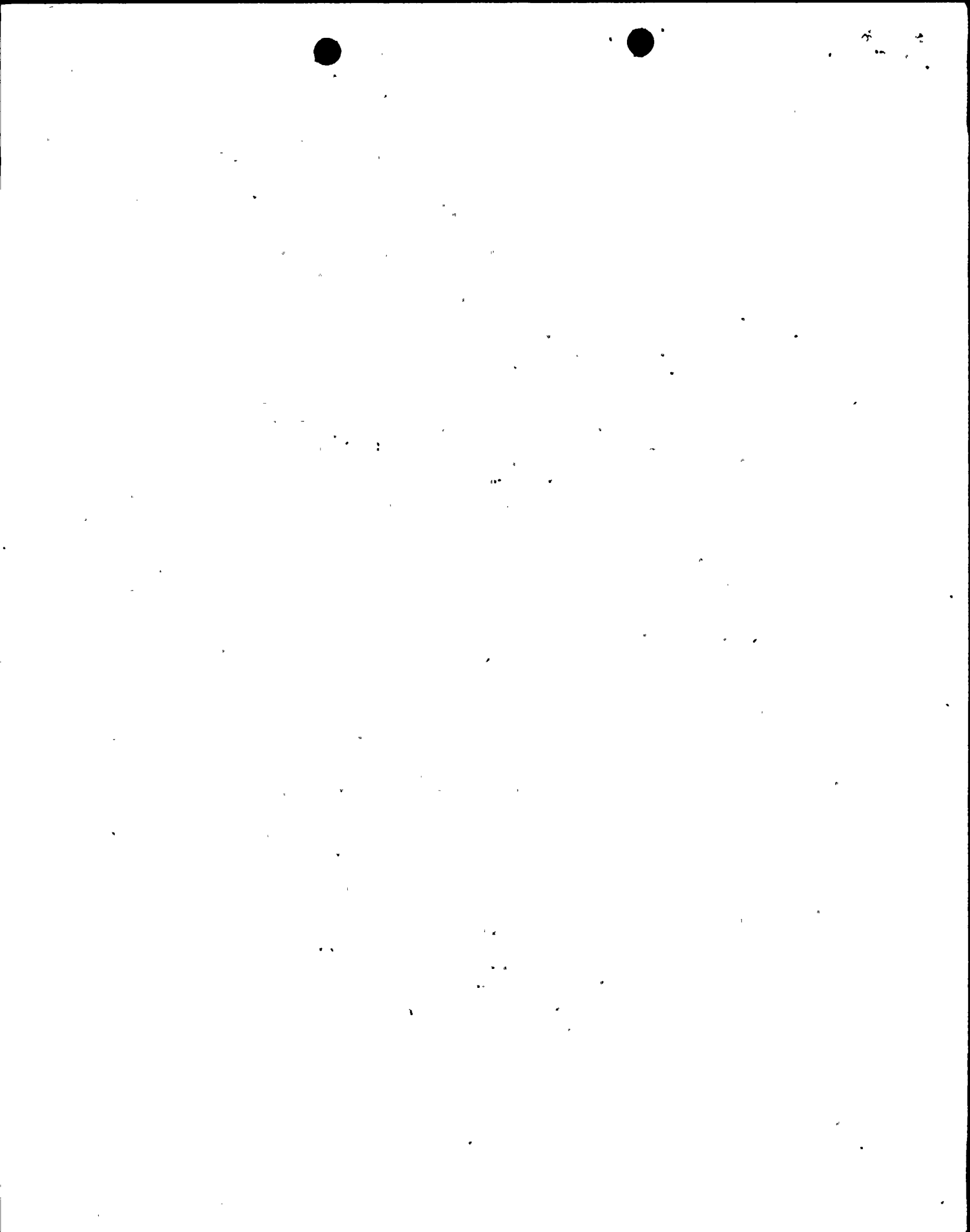
The selection criteria, and criteria for qualification for advancement within the technician job series is intimately associated with the Long Term technician training program. In the course of developing the training program, specific criteria for advancement to Senior Technician qualification have been identified. These criteria are represented by training requirements in excess of those specified by the existing job description, as was anticipated. NMPC management has notified the IBEW (August, 1981) of the need for a job classification review. It is currently planned that the Action Plan Item II.A and II.B scheduled date (1/82) will correspond to completion of the initial drafts of the technician job specifications, to be submitted for negotiation. Completion date is not known at this time, but is estimated to be June of 1982.

4. Action Plan Section III.A - External Exposure Control

The use of the Panasonic TLD system as the legal record was tentatively scheduled for January 1982 (See our letter of July 8, 1981). . . It is now planned that this usage will await testing in accordance with the proposed NBS National Voluntary Laboratory Accreditation Program based on ANSI N 13.11, Criteria for Testing Personnel Dosimetry Processors. We are currently scheduled to participate in a "third round" of testing conducted by the University of Michigan in February 1982, to evaluate any system shortcomings. Then we will follow the accreditation procedure as it is developed.

5. Action Plan Section III.C - Respiratory Protection Program

In the June status report (our letter of July 8, 1981), we proposed a Respiratory Status Report as a means of summarizing records for individuals, with a tentative completion date of September 30, 1981. Further evaluation has revealed this to require more extensive computer programming than initially envisioned. Consequently, we will require assistance of the off-site computer group, which will extend the development period. It is now anticipated to be completed in March, 1982.



6. Action Plan Section IV.B - ALARA Program Procedures

In a prior report (our letter of July 8, 1981 reporting June activity), we indicated specific procedures containing guidance as to what will constitute an ALARA review would be developed by September 30, 1981. In the interest of determining a good methodology, and in order to commence the small job reviews on a more timely basis, our Radiological Engineer has been reviewing specific job methodology since August. Consequently, the applicable procedures using experience gained are now scheduled for completion in December 1981.

7. Action Plan Section V.C - Radioactive Waste Management Procedures

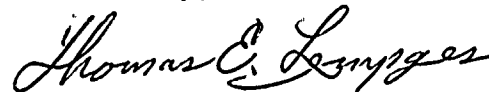
The Waste Handling Procedures (WHP) indicated in Table I were revised or drafted during the month of October.

8. Action Plan Section VI - Procedure Revision and Upgrade

Table I summarizes procedures completed in the month of October, and includes procedures under development or in process of revision. Changes in scheduled dates have been made based on monthly re-evaluation of priorities.

A comprehensive review of the Action Plan and Status Reports submitted to date will be included in next month's report to identify any items which are still incomplete, with a view toward summarizing the status of radiation protection improvements at the site. Please express any questions regarding any of these items to Mr. E.W. Leach at the Nine Mile Point Nuclear Station.

Sincerely,



Thomas E. Lempges  
Vice President -  
Nuclear Generation

mtm  
Attachments

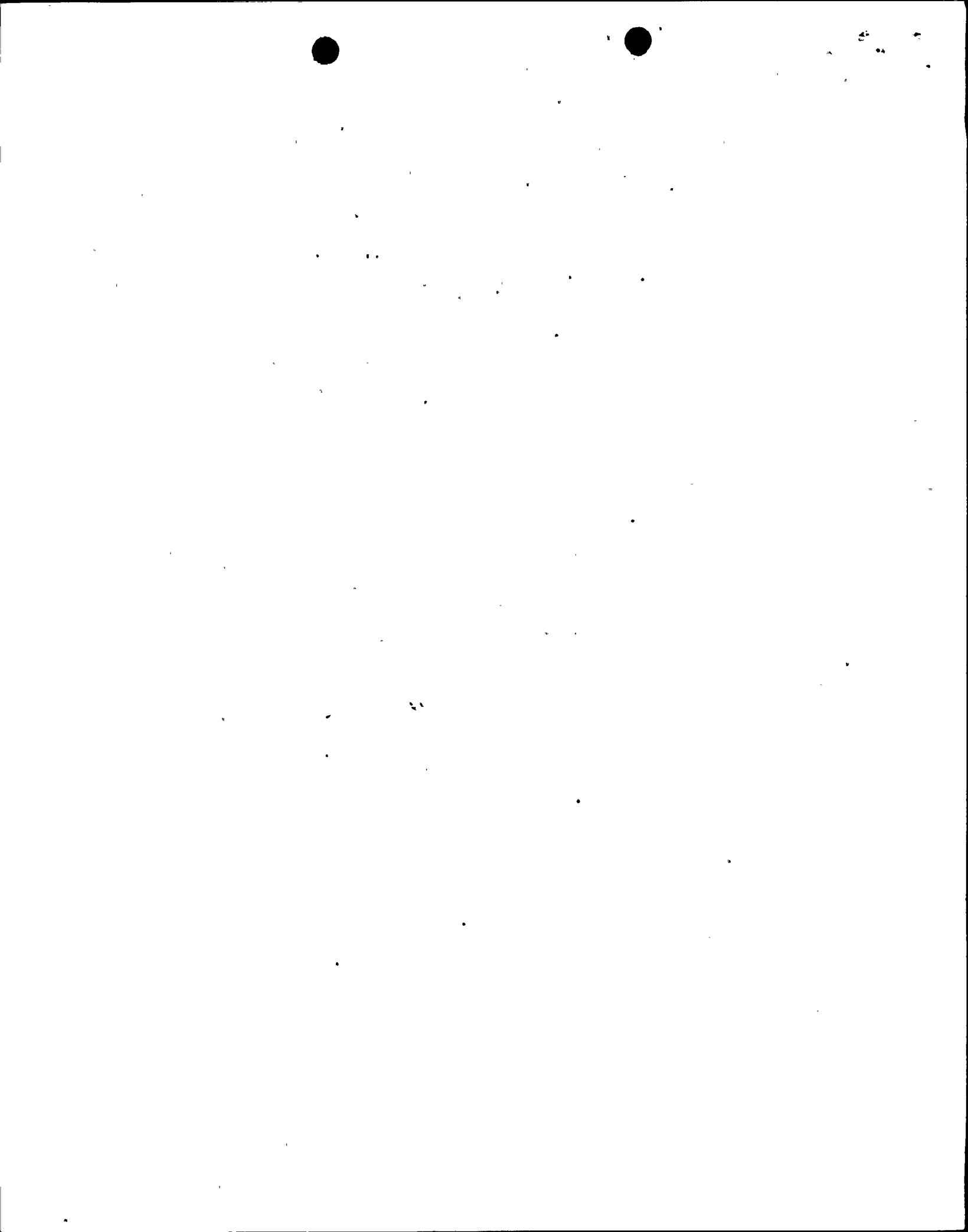


TABLE I  
SCHEDULE OF PROCEDURES

	<u>New or Revised Procedures</u>	<u>Approval Date</u>		
		<u>Scheduled</u>	<u>Rescheduled</u>	<u>Actual</u>
S-RTP-62	Respiratory Equipment - Assembly Test and Inspection, Storage (Rev. 2)	6/30/81	10/31/81	10/30/81
S-RTP-64	Operation and Calibration of the NaCl Quantitative Test System (Rev. 1)	4/30/81	10/31/81	10/28/81
S-RTP-55	Operation and Calibration of the Eberline Model HFM-3A Hand and Foot Monitor	5/31/81	12/31/81	
S-RTP-56	Operation and Calibration of the Eberline Model 530 N Survey Meter	5/31/81	11/30/81	
S-RTP-57	Operation and Calibration of the Model PING - 1A-MT Continuous Air Monitor	6/30/81	11/30/81	
S-RTP-16	Operation and Calibration of the Teletector and Modified Stack High Range Teletector	5/31/81	11/30/81	
S-RTP-17	Calibration and Operation of Beta-Gamma and Alpha Activity Monitor, Thyac III, Model 490	7/31/81	11/30/81	
S-RTP-50	Inspection and Calibration of Pocket Dosimeters	9/30/81	11/30/81	
S-RTP-46	Calibration and Operation of the Vamp Area Monitor	7/31/81	11/30/81	
V.A.-4	Calibration and Operation of the Model BC-4 Beta Counter	7/31/81	11/30/81	
S-RTP-49	Operation and Calibration of the High Range Survey Meter Underwater Model (CPMU)	8/31/81	10/31/81	
S-RTP-7	Issuing and Collecting Film Badges (Rev. 4)	10/31/81		10/30/81
RP-5	Methodology of Radiation and Radioactive Contamination Control	11/30/81		
RP-6	Packaging and Transportation of Radioactive Material	11/30/81		
IV.A.1-N	Operation and Calibration of The Atomic Absorption/Flame Emission Spectrophotometer	11/30/81		
RP-1	Access and Radiological Control (Rev. 3)			10/29/81
WHP-03	Cask Handling Procedure (Rev. 1)			10/05/81
WHP-04	Cask Loading Procedure (Rev. 1)			10/05/81
WHP-05	Cask Shipment Preparation Procedure (Rev. 1)			10/05/81
WHP-06	Van Handling Procedure (Rev. 1)			10/05/81
WHP-07	Van Loading Procedure (Rev. 1)			10/05/81

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DIVISION OF THE PHYSICAL SCIENCES  
DEPARTMENT OF CHEMISTRY  
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TABLE I  
SCHEDULE OF PROCEDURES  
 (continued)

	<u>New or Revised Procedures</u>	<u>Approval Date</u>		
		<u>Scheduled</u>	<u>Rescheduled</u>	<u>Actual</u>
WHP-12	Solid Dry Waste Collection and Compaction (Rev. 1)			10/05/81
WHP-08	Van Shipment Preparation Procedure (Rev. 1)			10/05/81
WHP-02	Initial Paperwork for Radioactive Waste Shipment (Rev. 1)			10/05/81
WPH-11A	Process Control Procedure - Dry Solid Waste (Rev. 0)			10/29/81
S-CAP-47	Sludge Volume (Rev. 1)			10/28/81
N1-ICP-PM-6	Off Gas Radiation Monitor Instrument Channel Calibration (Rev. 0)			10/29/81

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