

IE-HQ FILE COPY

June 22, 1982

Mr. Thomas Martin, Director
Division of Engineering and Technical Programs
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Re: Docket No. 50-220
Inspection Report No. 81-04

Dear Mr. Martin:

This refers to the routine safety inspection conducted by Mr. R.E. Baer of your office on March 3-6 and 24-27, 1981, of activities authorized by NRC License No. DPR-63 and to the discussion of your findings held by Mr. Baer with Mr. T.E. Lempges on March 5, 1981, and with Mr. M.A. Silliman of our staff at the conclusion of the inspection.

ITEM A 10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part. A survey is defined in Sec. 20.201(a) as an evaluation of the radiation hazards incident to the production, use, release, disposal or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation is to include a physical survey of the location of materials and measurements of levels of radiation or concentrations of radioactive material present. One such regulation, Sec. 20.103, requires that no licensee possess, use or transfer licensed material in such a manner as to permit any individual in a restricted area to inhale a quantity of radioactive material in excess of the limits specified therein.

Contrary to the above, on March 3 and 4, 1981, a number of individuals entered the area of an overflowing Reactor Building Equipment Drain Tank, an area of unknown airborne radioactivity concentrations, and no surveys were performed. Later, surveys of the area showed airborne radioactivity concentrations were 145% of 10 CFR 20, Appendix B, Table I, Column I values, the limits referenced in Sec. 20.103.



ITEM B

Technical Specification 6.11 requires that radiation protection procedures be prepared, approved and adhered to. Radiation Protection Procedure RP-2, approved February 13, 1979, Section 11.B.3, requires a Radiation Work Permit for all work involving unknown conditions in the area to be entered.

Contrary to the above, on March 3 and 4, 1981, a number of individuals entered and worked in the area of the overflowing Reactor Building Equipment Drain Tank, an area of unknown airborne radioactivity concentrations, and the required radiation work permit was not issued for this work.

RESPONSE TO ITEMS A & B

1. *The following corrective steps were taken to correct the identified violation: The personnel involved received instructions covering RWP requirements during their annual Radiation Protection Training.*
2. *In addition to the above listed action, Niagara Mohawk Power Corporation has committed to having 24 hour-a-day Radiation Protection Technician manning. This will ensure that the proper controls are addressed in any required Radiation Work Permits, and any surveys that are required can be made in accordance with the existing Station Radiation Protection Procedures. This action was committed to be complete by July 1, 1982.*
3. *During the current outage, 24 hour-a-day Radiation Protection coverage is in effect. Therefore, full compliance has been achieved.*

Very Truly Yours,

Thomas E. Lempges

Thomas E. Lempges
Vice President
Nuclear Generation

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