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July 28, 1982

Mr. Richard W. Starostecki
SALP Board Chairman
(Director, Division Of Project & Resident Programs)
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King Of Prussia, PA 19406

RE: Nine Mile Point Unit One
Docket No. 50-220
DPR-63

Dear Mr. Starostecki:

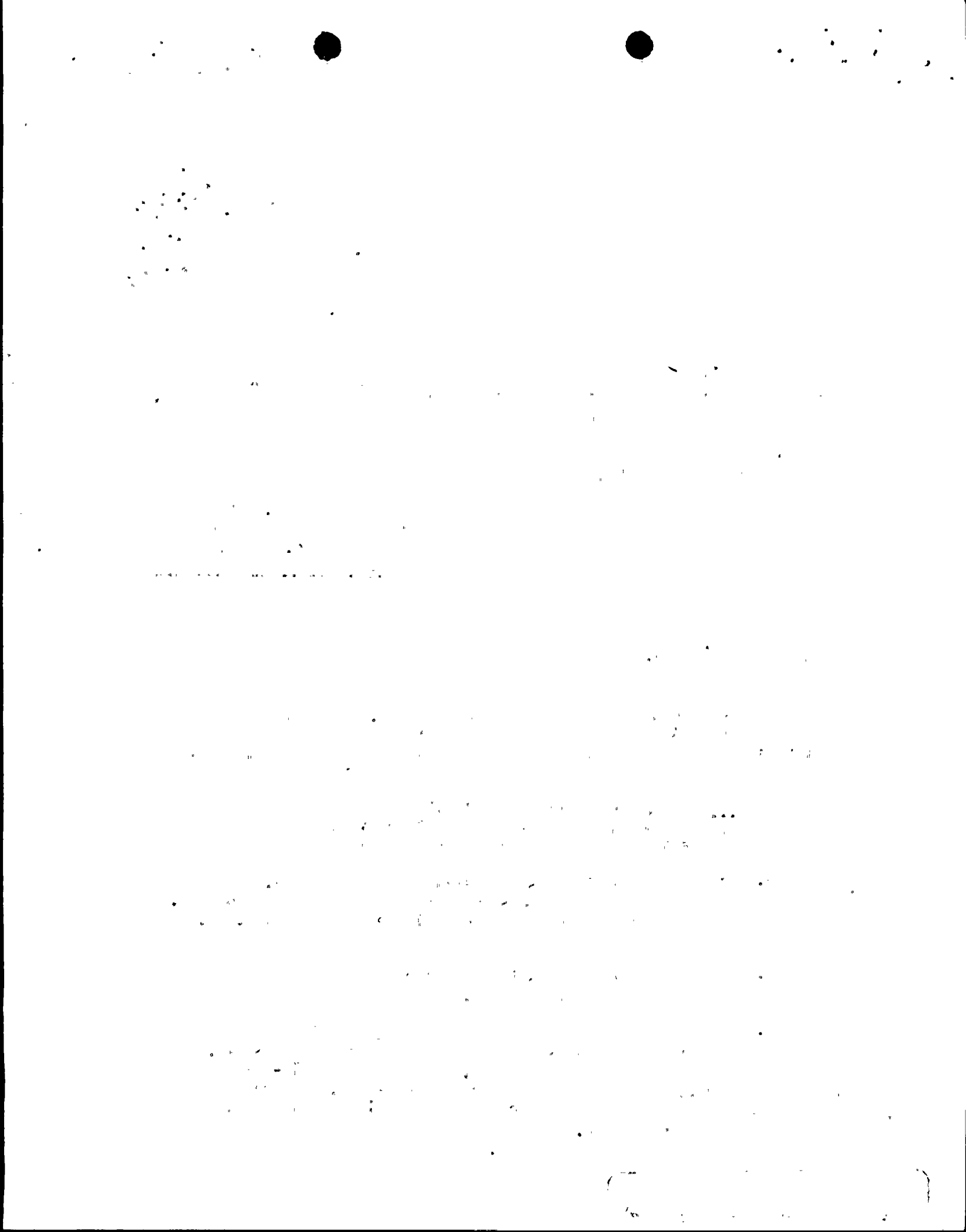
The NRC Region I SALP Board conducted a review of Nine Mile Point Unit One Nuclear Power Station activities on June 23, 1982. The following constitutes Niagara Mohawk Power Corporation's response to the Radiological Controls Section of the SALP report dated June 22, 1982:

COMMENT: ...the licensee failed to fulfill commitments to the NRC in the areas of internal exposure control, radiation and contamination surveillance, respiratory protection and ALARA.

RESPONSE: Niagara Mohawk intends to fulfill all commitments, in accordance with revised schedules agreed upon with Region I. Increased management attention will be paid in this area.

COMMENT: Corporate level professional support (in the area of Radiation Protection) is still lacking.

RESPONSE: Niagara Mohawk has in the past and will continue to use outside consultants as necessary to augment the corporate staff. During the assessment period, an additional full-time health physicist was added to the corporate staff. The corporate office is currently in the process of recruiting another full-time health physicist.



COMMENT: The ALARA Program still lacks two Radiological Engineers, and has only been partially successful in tracking job performance.

RESPONSE: One radiological engineer was employed during the assessment period. This person has since left the company.

Health Physics consultants are on-site to provide temporary radiological engineering services at Nine Mile Point. They will also assist in the recruiting of permanent Niagara Mohawk personnel to fill vacant radiological engineer positions.

COMMENT: During 1981, this licensee reported the third highest man-rem exposure in Region I.

RESPONSE: This is attributable to refueling activities and an increased number of modifications performed during the refueling outage. Nine Mile Point refuels every other year. A yearly comparison of Nine Mile Point total person-rem with average BWR person-rem reveals that Nine Mile Point person-rem have been slightly above average in refueling years (1981, 1979, 1977, etc.). However, they have been below average in other years (1980, 1978, 1976, etc.). According to the Environmental Impact Assessment by NRR for the safe end replacement, the average annual dose at Nine Mile Point from 1970 through 1981 was 700 person-rem. In comparison, the average annual dose at BWR's operating between 1974 and 1981 has been about 770 person-rem. Hence, when refueling fluctuations are eliminated by averaging, it can be seen that Nine Mile Point annual person-rem have been slightly below the average for BWR's.

NRC-required modifications (i.e.: fire protection, Mark I Containment, and TMI action items) accounted for 650 person-rem in 1981. Niagara Mohawk feels that the additional exposures resulting from modifications to meet NRC requirements should be taken into account if plants are to be ranked according to exposure. Niagara Mohawk agrees with the recommendation of the Advisory Committee on Reactor Safeguards to William J. Dircks, September 15, 1981, that the NRC should consider "factors such as the resulting occupational dose increment (or decrement), the anticipated reduction in risk to health and economic resources, the financial costs involved, and the added plant and/or operational complexity" before setting backfitting requirements.

Niagara Mohawk Power Corporation has taken steps to improve the ALARA program since the assessment period, as evidenced by NRC approval of the ALARA program to support safe end replacement. A consultant is on-site to develop a formal ALARA program.



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COMMENT: The licensee has tended to delay resolution in response to violations concerning high radiation area access. A one year time frame lapsed before corrective action was fully implemented.

RESPONSE: Corrective action was delayed until resolution was reached on what action was required. Once corrective action was determined, it was promptly implemented.

COMMENT: A violation for failure to establish a procedure for effluent tank discharge and a violation for failure to establish a calibration frequency for an effluent flow meter were identified.

RESPONSE: Per your Inspection Report 81-12 dated June 25, 1982, the non-compliance was corrected as soon as it was discovered and no further response or action was required.

Very truly yours,



T. E. Lempges, Vice President
Nuclear Generation

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Enclosure 4

