

September 3, 1982

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

IN HQ FILE COPY

RE: Docket No. 50-220
File No. IAL 80-38

Dear Mr. Haynes:

In accordance with the schedule for quarterly reporting, we are required to submit an Action Plan Progress Report covering the period April 1, 1982 through June 30, 1982. Due to the delay in preparing this report, we will also provide information through July 31, 1982. A summary will be presented of the status in each area as defined by IAL-80-38, and then the status of previous commitments will be updated.

A. ACTION PLAN ITEMS

1. Action Plan Sections IA and IB - Radiation Protection Organization, HP Management Staffing and Technical Support Staffing

During June 1982, two positions previously filled were vacated through transfer and resignation. The vacated Assistant Supervisor Chemistry and Radiation Protection position was awarded to the incumbent Respiratory Protection Coordinator. (A replacement Respiratory Protection Coordinator started work on 9/1/82). The vacated Radiological Engineer position was filled on a temporary basis by an individual from another department until contractor personnel (1 to 3 as required) could be obtained for this position. A part of the contract also provides assistance in finding a permanent replacement. (See Item 11 - ALARA Program and Table 1.)

A second Assistant Supervisor Chemistry and Radiation Protection was authorized for NMP#2.

2. Action Plan Section IC - Technician Staffing

The number of temporary junior technicians required for the current outage was established at approximately 39 rather than the 44 anticipated in our letter of May 14, 1982. Permanent technician hiring has continued; 31 positions were filled as of 7/31/82.

3. Action Plan Section ID - Clerical Staffing

In addition to the five regularly assigned plant operating clerks, approximately 10 additional personnel have been assigned to Radiation Records for the current outage.

4. Action Plan Section IE - Training Department Staffing for HP

No changes since the May 14, 1982 report.

5. Action Plan Section IIA and IIB - Personnel Selection Criteria and Qualification Criteria

The supervisory job description status is the same as reported May 14, 1982 except as indicated in Item 11 below

The technician job specifications have been compared for consistency across departments. The next negotiation sessions with the union on these specifications have been tentatively scheduled for mid-September.

6. Action Plan Section IIC - Training Programs

The General Employee Training Program revision to a slide-tape format is underway. This format allows for revisions to be made readily when forms or procedures change.

7. Action Plan Section IIIA - External Exposure Control

No changes since the May 14, 1982 report.

8. Action Plan Section IIIB - Internal Exposure Control

A new procedure (S-RTP-45A) was developed to specify the method to be used in determining the necessity for obtaining indirect bio-assay samples, and to specify the procedure for collection, handling, and shipping of samples.

9. Action Plan Section IIIC - Respiratory Protection Program

A Respiratory Status Report has been developed and is in use to control use of respiratory equipment. The status report is issued approximately weekly, and contains the following information:

- Department/Company
- Name
- Social Security Number
- Physical Date - (latest)
- Training Date
- Training Code - indicates by code number the device the individual has been trained to use
- Whole Body Count Date - latest
- Whole Body Count Code - 6, 12, or 24 month counting interval
- Fit Testing - indicates type of mask, date, and protection demonstrated (F or H)

9. Continued

This report includes coding to indicate when training, whole body count or physical is required.

Procedure revision to update use of respiratory equipment was completed in June (See RP-10).

10. Action Plan Section IIID - Surveillance Control

An Air Sample Analysis procedure (N1-CRP-1) has been developed to document the methodology used in analysis of airborne activity samples. This procedure includes provision for evaluation of alpha as well as beta gamma activity.

11. Action Plan Section IV - The ALARA Program

A computer system to track radiation exposure by task was initiated in June. Although primarily used for the Recirculation System maintenance at this time, it will be used for other work involving significant exposure. The evaluation of the Stoller REM System capabilities to perform similar functions is now not critical, so the end of 1982 schedule previously reported for this activity will be dropped. Procedure S-RTP-81 describes use of the dose tracking system.

Due to the resignation of the Radiological Engineer previously assigned ALARA program responsibility, and due to the magnitude of the task, formal ALARA program development has been contracted. The contract includes provisions to define an ALARA program to include Site and Corporate functions, evaluate staffing requirements and propose job descriptions, conduct preliminary screening of personnel to fill these positions, provide a training program for personnel who will implement the program, and provide Radiological Engineering assistance as required during the current outage.

In accordance with the schedule discussed with the contractor June 3, 1982, at least the site program will be completed by the end of 1982.

12. Action Plan Section V - Radioactive Waste Management

An Assistant Supervisor, Radwaste Operations was added to the staff in June 1982. A procedure describing the techniques for sampling waste for making curie estimates was completed in May 1982. (See N1-SP-13).

13. Action Plan Section VI - Procedure Revision and Upgrade

The procedures listed in Table 2 were drafted or revised in the time interval included in this report.

14. Action Plan Section VII - Calibration and Use of Instrumentation

The revision to the Whole Body Counter system procedure (RTP-45) includes provisions for calibration verification.

A revision was made to the Teletector calibration procedure to extend the range of calibration to 385 R/hr, taking advantage of the capability of the Eberline 1000B Calibrator.

15. Action Plan Section VIII - Work Area Radiation Control

The controls are essentially the same as those previously reported.

B. PREVIOUS COMMITMENTS STATUS

1. Action Plan Report dated 5/14/82

There were no specific commitments in the report which have not been addressed in Items A-1-15 above.

2. Action Plan Report dated 12/21/81

Item 3 identified an INPO effort to develop common training elements (and also a site specific program) for radiation protection training. NMPC intends to continue this investigation pending the results of the INPO meeting scheduled in September.

Item 4 identified certain computer programming changes under investigation. Upgrading of the current capability was accomplished as reported in Item A-11 above. A program to convert to the new Stoller system will not be developed until after the system is fully defined. The schedule has not yet been determined.

Item 5 referenced Table 1 listing 10 procedures in draft or under revision as a part of the procedure upgrade process. Three of these have been completed to date (S-RTP-16, S-RTP-17, and IV.A.1-N). Other procedural and operational priorities have down-graded the priority of the remaining procedures such that no schedule has been established for their completion.

3. Action Plan Report dated 11/19/81

Schedules identified in this report in Items 1 and 3 for Management and Technician job description updates were somewhat optimistic and did not take into account the general union contract negotiations. Although some work is being done in these areas, no final completion date is now targetted due to outage commitments.

The Respiratory Status Report identified in Item 5, anticipated for completion in March, was completed in June as reported above.

3. Continued

The ALARA Program procedures identified for completion in December 1981 were subsequently determined to be inadequate for a program of the scope desired. Current status is as indicated in Item A-11 above.

Item 8, procedure upgrade, referenced Table 1 which included estimates of scheduled or actual revision dates. Of the 12 procedures identified for drafting or review, 4 have been completed (S-RTP-57, S-RTP-16, S-RTP-17, IV.A.1-N). It should be noted that S-RTP-57 was numbered S-RTP-76 when issued. The remaining 8 currently have no completion dates assigned.

4. Action Plan Report dated October 13, 1981

Item 2 identified 12 technician positions which were authorized in order to allow for 24 hr/day coverage. Although some positions have still not been filled (See Item A2), 24 hour coverage has been provided since the current outage began in March 1982.

Item 6, procedure upgrade, identified a schedule of procedures in Table II. Those not completed as scheduled are the same 8 identified in Item B3 of this report.

5. Action Plan Report dated September 5, 1981

Item 5 of the report identified certain Respiratory Protection improvements anticipated to be completed by the end of 1981. These were completed in June, as noted in Items A9 and A14 above.

Item 8 identified procedures in the attached Table 1 for revision. All but 6 have now been revised, and these have been carried on to the later reports identified above.

6. Action Plan Report dated August 6, 1981

The same procedural comment applies as for the September 5, 1981 report.

If any specific status information, in addition to that provided above, is required, contact Mr. E. Leach at the Nine Mile Point Nuclear Station.

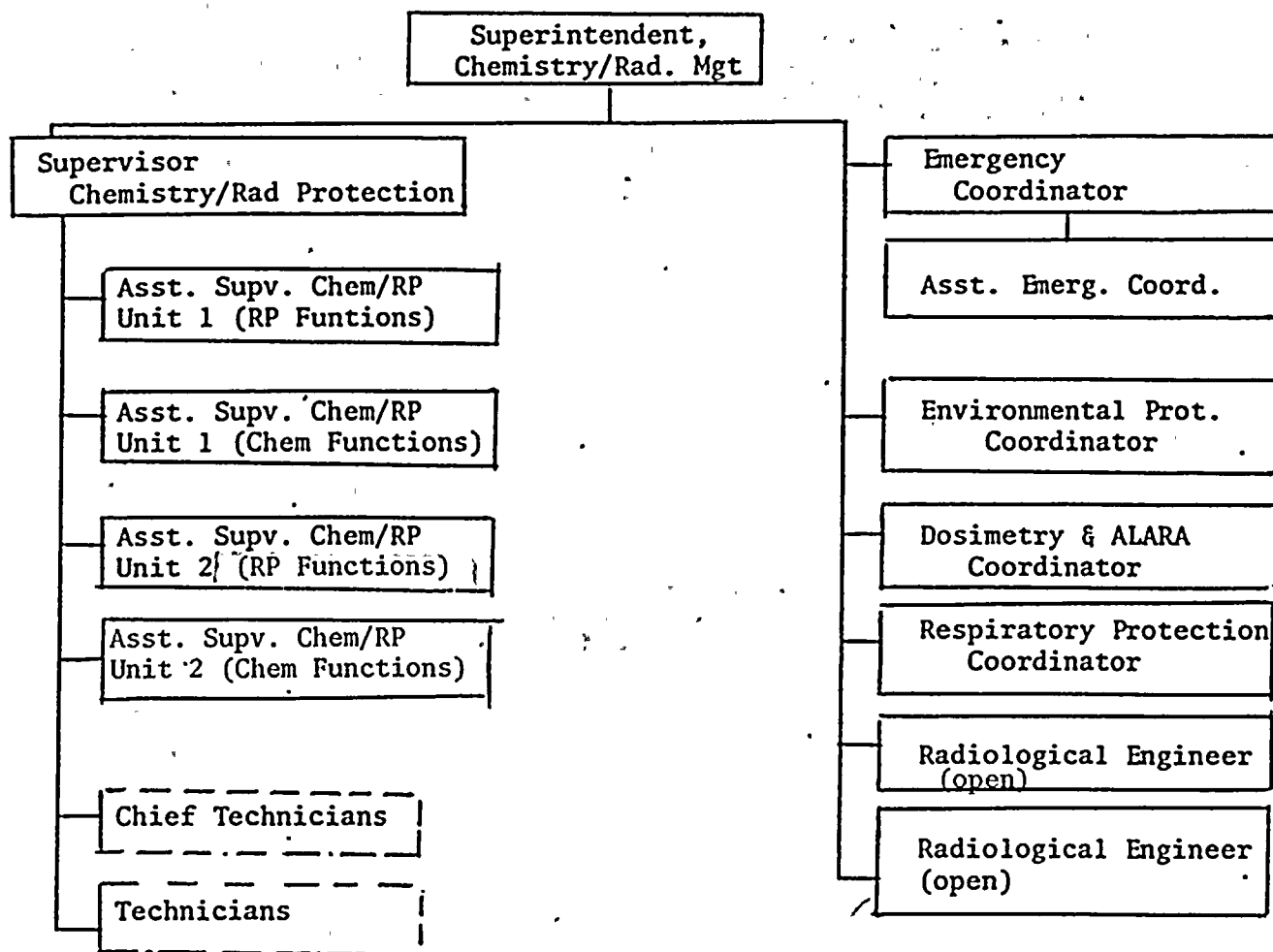
Very truly yours,

C. V. Mangan

C. V. Mangan
Vice President
Nuclear Engineering & Licensing

TABLE 1

DEPARTMENTAL STAFFING



Supervisory Positions

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Represented Positions

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TABLE 2

Procedures Developed or Revised, 4/82 - 7/82

S-RTP-81	Accumulated Dose Tracking by Task System (ADTTS) Revision 0 6/25/82
S-RTP-16	Operation and Calibration of the Teletector and Modified Stack High Range Teletector Revision 2 6/30/82
S-RTP-35A	Sealed Source Leakage/Contamination Test (This procedure superceded S-RTP-35) Revision 0 6/30/82
S-RTP-35B	Accountability of Calibration and Check Sources Revision 0 6/30/82
RP-10	Use of Respiratory Equipment Revision 0 6/17/82
N1-RTP-45	Whole Body Counter System Operation and Calibration Revision 3 6/30/82
S-RTP-45A	Indirect Bio-assay Sampling Revision 0 7/22/82
N1-CRP-1	Air Sample Analysis Revision 0 7/30/82
N1-SP-13	Waste Sampling and Curie Content Analysis for Waste Shipments Revision 0 5/6/82
IV.A.1-N	Operation and Calibration of the Atomic Absorption/Flame Emission Spectrophotometer Revision 0 7/27/82

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