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June 24, 1983

Mr. James M. Allen
Acting Regional Administrator
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

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

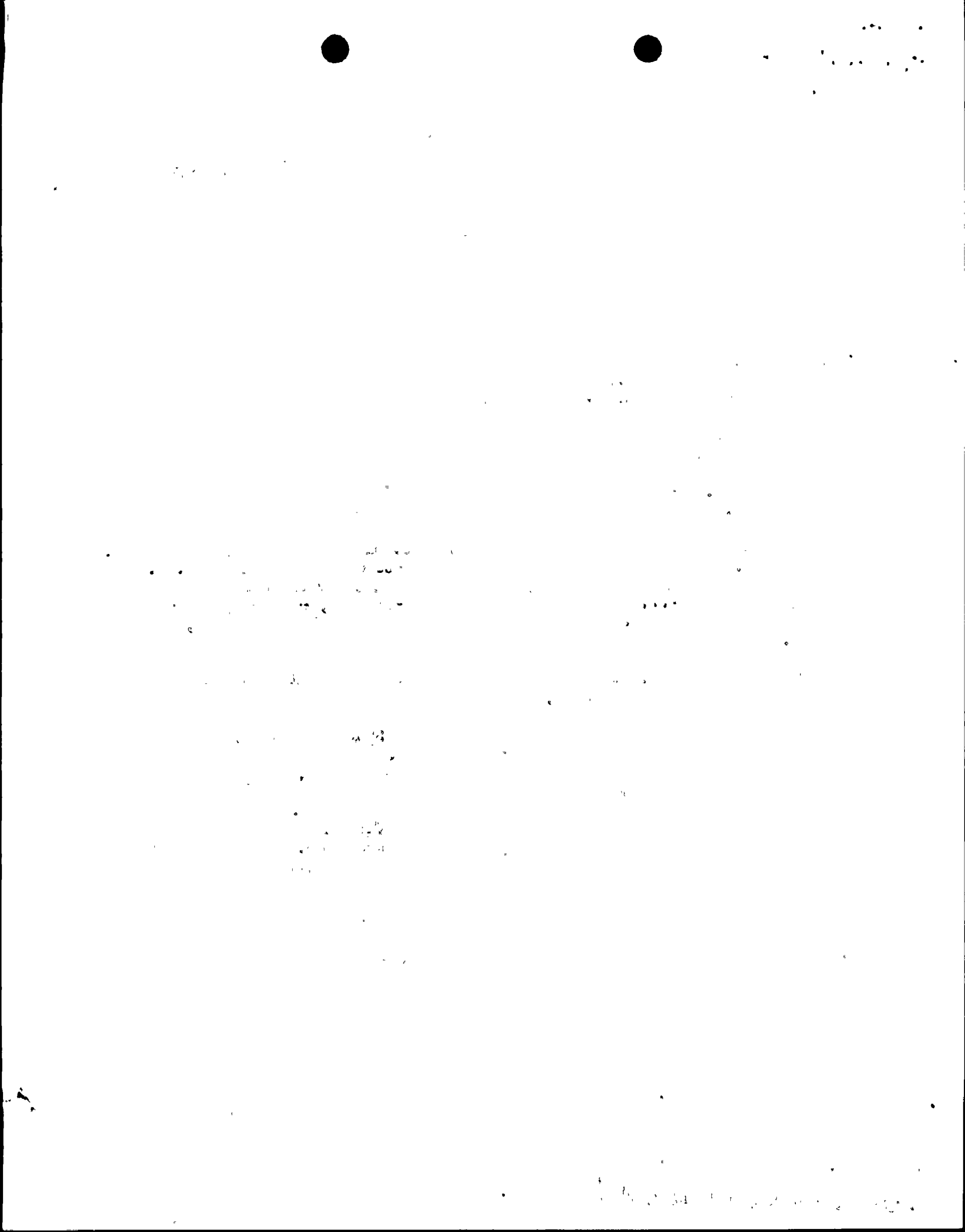
The Action Plan report for the first quarter of 1983 is hereby transmitted. During the quarter, inspection 83-03 was conducted by Mr. R. L. Nimitz of your office. Health Physics Appraisal items were addressed, resulting in close-out of items 80-11-04, -20, -21, -46, -54, -56, and -61. These items have been correlated to Action Plan items, where possible, in this report.

Please contact Mr. E. Leach at the Nine Mile Point Nuclear Station for additional specific information, if required.

Sincerely yours,

Charles V. Mangan
Charles V. Mangan
Vice President
Nuclear Engineering
and Licensing

CVM/EL/cma



ACTION PLAN PROGRESS REPORT

1ST QUARTER 1983

I. RADIATION PROTECTION ORGANIZATION

A. HEALTH PHYSICS MANAGEMENT STAFFING

In the proposed reorganization, a fifth alternate was presented for review and discussion. Job descriptions were being reviewed and modified, where necessary, from the previous four plans submitted, and were approximately 75% complete at the end of the quarter.

The fifth alternative has the Superintendent of Chemistry and Radiation Management overseeing the entire program. At the level immediately below and answering to the SCRM are the Supervisor Chemistry and Radiation Protection who oversees the Unit I and Unit II operational programs, and the Supervisor Radiological Technical Support who oversees Dosimetry, ALARA, Radiological Engineering, Respiratory Protection, Emergency Planning and Environmental Coordinators. During the second quarter this and the other options will be reviewed by NMPC management.

B. TECHNICAL SUPPORT STAFFING (COORDINATORS)

On site support by temporary consulting staff continued during the first quarter on an "as required" basis.

The proposed reorganization is designed to strengthen the staffing for technical support positions, coordinated by a Supervisor, implemented by coordinators, with adequate staff to perform the support functions.

C. TECHNICIAN STAFFING

NRC inspection item 80-11-04, referring to the number of department personnel, has been closed, combining it with item 80-11-03, which remains open pending final evaluation of training. For the purposes of this action plan item, NMPC assumes (as reported in the 3rd quarter 1982 report) that this item is currently satisfied.

D. CLERICAL STAFFING

Actions complete pending NRC review.

E. TRAINING DEPARTMENT STAFFING FOR HP

Actions complete pending NRC review.



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II.

PERSONNEL SELECTION, QUALIFICATION AND TRAINING

A. SELECTION CRITERIA

Revised Job Specifications for technicians were approved by the Union and became effective January 30, 1983.

B. QUALIFICATION CRITERIA

General qualification criteria for technicians were approved by the Union and became effective January 30, 1983.

C. TRAINING PROGRAM

1. TRAINING - SHORT TERM

The 3rd quarter 1982 Action Plan Report indicated all technicians employed in the Radiation Protection group as of 2/23/81 completed the three week G.E. technician training program. In review of training and employee records it was determined that a new technician who started work 2/22/81 and a technician foreman who retired in 1981 were not included in the short term program. The new technician will be included in the long-term training program.

2. RP ORGANIZATION LONG-TERM TRAINING

Development and implementation of an OJT program and requalification program will be addressed in an Administrative Procedure which was scheduled for issue on 4/8/83. Review and coordination with the Administrative Procedures for comparable positions in other departments has extended the expected completion date until June 30, 1983.

3. GENERAL EMPLOYEE TRAINING

The Training Department is completing a training program for General Employee Training retraining. (The retraining program was implemented in April of 1983.)

4. INSTRUCTOR TRAINING

Complete pending NRC concurrence.

5. QUALITY OF TRAINING AIDS IMPROVEMENT

Complete pending NRC concurrence.



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III. A. EXTERNAL EXPOSURE CONTROL

1. DOSIMETRY PROGRAM

The Panasonic TLD system has been in use as a backup to the Film Badge dosimetry system since May 1981. Detailed procedures describing the operation of the system are currently under review and will be implemented during the second quarter of 1983. NMPC intends to continue to evaluate the TLD system and intends to prepare for participation in the NVLAP program some time in the future.

NMPC sent a representative to the International Beta Dosimetry Symposium in February, 1983.

The Stoller Security/Radiation Protection computer will be installed during the summer of 1983 and is expected to be operational as a Security Access system in late 1983. The radiation exposure recording function will not be incorporated into this system until 1985. Control of High Radiation Area access via the system is tentatively scheduled for 1984.

2. EXPOSURE REVIEW

On February 14, 1983, procedure RP-1 was revised to include procedures to be followed by supervisors where there are reported discrepancies between exposures measured by the three available systems.

NMPC has concluded that the actions necessary to resolve this Action Plan item have been completed.

3. QUALITY ASSURANCE

Complete pending NRC concurrence.

B. INTERNAL EXPOSURE CONTROL

1. DOSIMETRY PROGRAM

Inspection 83-03 identified program improvements required; S-RTP-10 is in the process of being revised and will address the Action Plan Items remaining.

2. EXPOSURE REVIEW

See item III.B.3. below.



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B. INTERNAL EXPOSURE CONTROL (Cont'd)

3. EXPOSURE LIMITATIONS

Increased efforts have been directed towards station cleanup and decontamination. A new procedure, RP-5 "Contamination Control" was completed on March 31, 1983. This procedure provides guidance for evaluating the protection provided by protective clothing, that is, it provides the methodology for calculating skin dose due to contamination. Further guidance in evaluating protection provided by protective equipment will be included in a revision to S-RTP-10, "Calculation of Internal Radiation Exposure; scheduled for July 1983.

C. RESPIRATORY PROTECTION METHODOLOGY

1. POLICY STATEMENT

NMPC considers this item closed based on closeout of Item 80-11-19 during inspection 82-20.

2. RESPIRATORY PROTECTION METHODOLOGY

Revision 2, to Procedure No. RP-10 "Use of Respiratory Equipment" was issued on February 14, 1983, to provide for use of additional equipment, and provide more detailed instructions for use of equipment.

The procedure for preoperational testing the Solidification and Storage Building breathing air system extension was approved in November, 1982. Successful completion of this test procedure demonstrated that the system continues to supply Grade D breathing air.

The responsibility for field training for use of respiratory equipment will be transferred to the Training Department in June, 1983.

3. RECORDS PROGRAM

NRC inspection item 80-11-18 remains open for tracking of this item.

D. SURVEILLANCE CONTROL

1. SELF-MONITORING PROGRAM

NRC inspection item 80-11-61 can be correlated to this Action Plan Item and the inspection item was closed during the 83-03 inspection. This supports NMPC's decision to classify this Action Plan Item complete in the third quarter report of 1982.



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D. SURVEILLANCE CONTROL (Cont'd)

2. DOSE RATE, CONTAMINATION, AIR SAMPLING PROCEDURES

Procedure RP-5 "Radiation and Radioactive Contamination Control" was completed March 31, 1983. This is the last of a series of procedures which provide control of surveillance in these areas. NMPC has concluded that actions necessary to resolve this Action Plan Item have been completed.

3. SURVEY INSTRUMENT SENSITIVITY

NMPC believes this item to be complete as reported in our fourth quarter 1982 report.

4. MEASUREMENT AND DOCUMENTATION

Procedure RP-5 "Radioactive Contamination Control", completed March 31, 1983, provides upgraded documentation of contamination incidents.

NRC inspection items 80-11-20, 80-11-21, 80-11-23 and 80-11-61 can be correlated to this Action Plan Item. Inspection items 80-11-20, 80-11-21 and 80-11-61 were closed during the 83-03 inspection. Item 80-11-23 was closed during inspection 82-06.

NMPC has concluded that the actions necessary to resolve this Action Plan Item have been completed, pending NRC inspection of other related items.

IV. THE ALARA PROGRAM

Due to Outage commitments and the work expended in evaluating organization and staffing, the program status remains the same as reported in our third and fourth quarter 1982 reports.

V. RADIOACTIVE WASTE MANAGEMENT

A. ASSIGNMENT OF RESPONSIBILITY AND AUTHORITY

The status is the same as reported in our fourth quarter 1982 report.



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V. RADIOACTIVE WASTE MANAGEMENT (Cont'd)

B. MANPOWER REQUIREMENTS

The status was reviewed during inspection 83-03. Inspection item 80-11-42 remains open pending finalization of job descriptions. NMPC assumes the number of personnel assigned is considered adequate; therefore, this Action Plan item is complete.

C. PROCEDURE UPDATE

The status is the same as reported in our fourth quarter 1982 report.

VI. PROCEDURE REVISION AND UPGRADE

A. ADMINISTRATIVE/GENERAL EMPLOYEE

All administrative procedures have been revised or undergone routine review since the 80-11 inspection. The RP series of procedures will be extended to include RP-6 (Shipment of Radioactive Materials) and RP-7 and RP-8 (ALARA Program). RP-6 will replace and update current procedures, and is scheduled for completion in July 1983.

B. CHEMICAL ANALYTICAL PROCEDURES

This set of procedures is not within the scope of the Health Physics Appraisal and should be removed from the Action Plan. NMPC intends this item be administratively closed and removed from subsequent reports.

C. COUNTING ROOM PROCEDURES

Complete, pending NRC concurrence.

D. LABORATORY INSTRUMENTATION PROCEDURES

These procedures address the use of non-radiological chemistry instrumentation and are outside of the scope of the Health Physics Appraisal and should be removed from the Action Plan. NMPC intends this item be administratively closed and removed from subsequent reports.

E. PROCESS SURVEY PROCEDURES

N1-PSP-1 and S-PSP-7 have been reviewed and deemed to require upgrading. S-PSP-7 was scheduled for completion by 4/30/83, and N1-PSP-1 by startup.



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VI. PROCEDURE REVISION AND UPGRADE (Cont'd)

F. RP TECHNICAL PROCEDURES

Approximately 85% of the procedures in this section have been reviewed and revised since the Health Physics appraisal. The remaining procedures will be reviewed or revised by June 30, 1983. Procedures required for surveillance items were revised by reactor startup.

G. SAMPLING PROCEDURES

All required sampling procedures were current at the end of the first quarter, or were revised prior to start-up.

VII. CALIBRATION AND USE OF INSTRUMENTATION

A. INSTRUMENT CALIBRATION FACILITY

The upgraded instrumentation facility is in operation with the necessary procedures. This item can be directly correlated to Health Physics Appraisal item D.18, 50-220/80-11-37 and was reviewed in the follow-up inspection of 82-06. The only outstanding area identified was the verification of the training records which are complete and available for review.

NMPC has concluded that the actions necessary to resolve this Action Plan item have been completed.

B. COUNTING ROOM INSTRUMENTATION

A recent review of the counting room instruments indicated the previously scheduled instrument upgrades and improvements are complete.

In support of this item two procedures were identified that require review and/or revision (V.A.5-N and V.A.4). They will be completed prior to the end of the second quarter.

C. PROCESS MONITORS

All process monitor calibration procedures were current at the end of the first quarter, or were revised prior to start-up.

D. PORTABLE SURVEY INSTRUMENTS AND SAMPLERS

With the revision to S-RTP-16 March 25, 1983, providing for source response check for the high range detector on the Teletector, this item is complete.

E. METHODOLOGY OF INSTRUMENT SELECTION, USE AND INTERPRETATION

Complete pending NRC concurrence.



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VIII. WORK AREA RADIATION CONTROLS (CONTAMINATION AND RADIATION AREAS)

A. LAUNDRY FACILITIES

Complete pending NRC concurrence.

B. EXIT POINT CONTAMINATION CONTROL

Complete pending NRC concurrence.

C. HIGH RADIATION AREA ACCESS CONTROL

Complete pending NRC concurrence.

D. AUDIT OF ADHERENCE TO PROCEDURE

APN-12 contains provisions for Radiological Incident Reports, and RP-5 contains provisions for Non-Conformance Event Transmittals. These procedures have been issued to provide a formal method to identify, track and document non-adherence to procedures.

Based on the implementation of these procedures NMPC feels the item is completed and it will not be addressed in subsequent reports.

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ATTACHMENT 1

PROCEDURES APPROVED IN THE 1ST QUARTER 1983

PROCEDURE NO.	PROCEDURE TITLE	REVISION	COMPLETION DATE	NOTES
S-CRP-9	Analysis of Environmental Samples	4	3/31/83	(review only)
NI-PSP-13	Sampling of High Activity Reactor Water Using the 277' Turbine Building Post Accident Sampling System	1	3/31/83	
NI-RTP-45	Whole Body Counter System	4	3/3/83	
S-RTP-9	Radiation Exposure Monitoring System Operation	3	2/4/83	
S-RTP-15	Operation and Calibration of the Beta-Gamma Dose Rate Instrument, "Cutie Pie" 740A and 740F	4	1/21/83	
S-RTP-16	Operation and Calibration of the Teletector and Modified Stack High Range Teletector	3	3/25/83	
S-RTP-46	Operation and Calibration of Vamp Area Monitor	1	1/21/83	
S-RTP-49	Operation of the High Range Survey Meter Underwater Model (CPMU)	0	1/6/83	(review only)
S-RTP-74	Operation and Calibration of Minirad Radiation Monitor	1	1/21/83	
RP-5	Radiation and Radioactive Contamination Control	0	3/31/83	



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ATTACHMENT 1 (Cont.)

PROCEDURES APPROVED IN THE 1ST QUARTER 1983

PROCEDURE NO.	PROCEDURE TITLE	REVISION	COMPLETION DATE	NOTES
RP-10	Use of Respiratory Equipment	2	2/14/83	
RP-11	Performance of Radiography with Licensed Sealed Sources	1	2/16/83	
V.A.7-N	Operation and Calibration of the GeLi-1 and GeLi-2 Gamma Spectroscopy Systems	1	2/15/83	

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