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AUTH. NAME AUTHOR AFFILIATION  
 KEISER, H.W. Pennsylvania Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 BELLAMY, R.R. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 890616 ltr re violations noted in Insp Repts  
 50-387/89-12 & 50-388/89-12.

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JUL 17 1989

Mr. Ronald R. Bellamy, Chief  
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SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO NOTICE OF VIOLATION  
(387/89-12-02; 388/89-12-02)  
PLA-3221 FILES R41-1C, R41-2

Docket Nos. 50-387  
and 50-388

Dear Mr. Bellamy:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/89-12 and 50-388/89-12 dated June 16, 1989.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. We trust that the commission will find the attached response acceptable.

Very truly yours,

H. W. Keiser

Attachment

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S. Barber, NRC Sr. Resident Inspector  
Mr. M. C. Thadani, NRC Project Manager

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## RESPONSE TO NOTICE OF VIOLATION

### VIOLATION (387/89-12-02; 388/89-12-02)

Technical Specification 6.11 requires, in part, that procedures for personnel radiation protection shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Radiation Protection Procedure HP-TP-602, Surveys and Release of Tools, Equipment and Material, requires in section 9.2 that all material shall be surveyed by Health Physics prior to release from a Controlled Zone. The material may be released provided it is less than 100 counts per minute (cpm) above background fixed contamination and less than 1000 disintegrations per minute (dpm) removable or there is no indication of contamination when the material is placed in a tool monitor.

Contrary to the above, on April 27, 1989, several tools including 2 grinding wheels, 3 nylon slings, 2 hammers and a tape measure, measuring between 200-400 counts per minute (CPM) fixed contamination above background were released from the Controlled Zone. The tools were not placed in the tool monitor.

### RESPONSE:

#### 1. Corrective Steps Which Have Been Taken And The Results Achieved:

PP&L's review of this violation, which included a comparison of this occurrence against the extensive contamination control program changes made over the past 18 months, concluded that it was the result of an isolated personnel error and is not indicative of a programmatic weakness in PP&L's Contamination Control Program. Therefore, PP&L has taken the following actions:

- a. The suspect tools found in the combo shop were surveyed. One hammer read 60 CPM above background, all the other tools passed the tool monitor. The combo shop was subsequently surveyed with no evidence of contamination.
- b. Health Physics supervision reviewed the incident with the technician involved.
- c. Health Physics technicians assigned to controlled zone egress points were immediately retrained regarding this occurrence.
- d. Health Physics technicians assigned to control points were retrained on HP-TP-602 "Survey and Release of Tools, Equipment, and Material".

2. Corrective Steps Which Will Be Taken To Avoid Further Violations:

- a. Health Physics will develop an on-the-job training guide for personnel monitoring control zone egress points. This guide is scheduled to be completed 9/30/89.
- b. Health Physics will provide "user controlled" procedures at manned egress points for technician use. These procedures are scheduled to be completed by 9/30/89. The effectiveness of this corrective step will be evaluated for permanent use following completion of the Unit 2 third refueling and inspection outage (estimated 11/23/89).
- c. PP&L is aware that the present program for the storage of tools results in a high volume of tools crossing the controlled zone boundary during outages. This issue is being addressed as part of our maintenance improvement program.
- d. The importance of proper contamination control practices will be the subject of personnel briefings prior to the Unit 2 third refueling outages.

3. Date When Full Compliance Will Be Achieved:

Based on (1) above, PP&L is in full compliance.