

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/85-25

Docket No. 50-244

License No. DPR-18 Priority - Category C

Licensee: Rochester Gas and Electric Corporation
49 East Avenue
Rochester, New York 14649

Facility Name: Ginna Nuclear Power Plant

Inspection At: Ontario, New York

Inspection Conducted: November 18-22, 1985

Inspectors: *T. Dragoun*
T. Dragoun, Radiation Specialist

12/12/85
date

Approved by: *R.L. Nemethy for*
M. Shanbaky, Chief
PWR Radiation Protection Section

12/12/85
date

Inspection Summary: Inspection on November 18-22, 1985 (Inspection Report No. 50-244/85-25)

Areas Inspected: Routine, unannounced inspection of the licensee's radiation safety program including: general employee training; HP technician training; Process Control Program; receipt of spent fuel from West Valley; radioactive material storage provisions; and status of the ALARA program.

Results: No violations were identified.

8512200084 851213
PDR ADDCK 05000244
Q. PDR



DETAILS

1.0 Persons Contacted

During the course of this inspection the following personnel were contacted or interviewed:

1.1 Licensee Personnel

- * S. Spector, Plant Superintendent
- * D. Filkins, Health Physics and Chemistry Manager
- T. Marlow, Maintenance Manager
- R. Morill, Training Manager
- J. Widay, Technical Manager
- R. Burt, HP Training Coordinator
- S. Ersteniuk, Instructor
- * W. Goodman, HP Foreman
- * B. Quinn, Corporate Health Physicist
- * F. Mis, Health Physicist/Rad Waste Supervisor
- S. Sagaties, Health Physicist/ALARA Supervisor
- * V. Supina, Dosimetry Supervisor/ALARA Coordinator
- S. Thompson, Maintenance Plant Foreman
- K. Triou, Training Coordinator
- * S. Warren, Health Physicist

* Attended the Exit Interview on November 22, 1985

1.2 NRC Personnel

W. Cook, Resident Inspector

2.0 Purpose

The purpose of this routine inspection was to review the licensee's radiation protection program with respect to the following elements:

- General Employee and HP technician training
- Process Control Program
- Spent Fuel Receipt
- Radioactive Material Storage Provisions
- ALARA Program Status

3.0 General Employee and HP Technician Training

The licensee's general employee and HP technician training programs were reviewed against criteria contained in:

- 10 CFR 19.12, Instructions to workers;
- 10 CFR 20.206; Instruction of personnel;

- Regulatory Guide 8.13, Instruction Concerning Prenatal Radiation Exposure;
- Regulatory Guide 8.27, Radiation Protection Training for Personnel at Light-Water-Cooled Nuclear Power Plants;
- Regulatory Guide 8.29, Instruction Concerning Risks from Occupational Radiation Exposure;
- Technical Specification 6.3, Station Staff Qualifications;
- Technical Specification 6.4, Training; and
- ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel.

The licensee's performance relative to these criteria was determined by:

- Interviews with instructors
- Reviews of training materials
- A review of instructor training and experience

Within the scope of this review no violations were identified. The general employee training program, although adequate, requires a technical review and update of some of the training material by qualified HP personnel. Recommendations regarding this training are provided in the Regulatory Guides. The licensee stated that this review will be completed by February 1986. (85-25-01)

In anticipation of turnover in the training staff two inexperienced instructors were hired. The indoctrination program for these instructors has not been formalized. The licensee stated that a replacement training program will be developed for these instructors in accordance with the technical specification for facility staff. (85-25-02)

These items will be reviewed in future inspections.

4.0 Process Control Program

The licensee's Process Control Program was reviewed against criteria contained in:

- Technical Specification 6.16, Process Control Program;
- 10 CFR 61.56, Waste Characteristics;
- 10 CFR 20.311, Transfer for disposal and manifests;
- Station procedure RD-16.0, Process Control Program;
- Station procedure RD-10.0, Preparing Radioactive Material for shipment or storage; and
- Station procedure ST-81.1, Drumming of Waste Evaporator Bottoms and Miscellaneous Waste.

The licensee's performance relative to these criteria was determined by interviewing selected personnel and review of selected documents.

Within the scope of this review, no violations were observed.

5.0 Spent Fuel Receipt

Spent fuel elements are being returned from West Valley, New York, for on-site storage. This project is approximately 65% complete. Detailed procedures with sign-offs and QC checks are used to control the unloading of the fuel cask. Radiological precautions and surveys appear adequate. Licensee records indicate that personnel exposures for this project are well below original estimates. Current cumulative personnel exposure is 1.864 man-Rem.

Within the scope of this review, no violations were observed.

6.0 Storage of Radioactive Material

The licensee's provisions for temporary storage of low level radioactive waste on site was reviewed against criteria contained in:

- 10 CFR 50.59, Changes, tests and experiments;
- NUREG-0800, Standard Review Plan, Appendix 11.4-A, Design Guidance for Temporary Onsite Storage of Low-Level Radioactive Waste;
- Regulatory Guide 1.143,
- IE Circular No. 80-18, 10 CFR 50.59 Safety Evaluations for Changes to Radioactive Waste Treatment Systems; and
- Generic Letter 81-38, Storage of Low-Level Radioactive Wastes at Power Reactor Sites.

The licensee's performance relative to these criteria was determined by discussions with the radwaste coordinator, a tour of storage facilities, and a review of selected documents.

Within the scope of this review, no violations were observed. The licensee's projections indicate that adequate onsite storage space is available in the event of temporary cut off of accessible burial facilities. A contingency plan has been developed to cope with a cut off extending beyond 1986. The licensee's plans appear reasonable.

The current onsite storage facility was planned and constructed in the early 1980's. A safety analysis was completed using the NRC guidance available at that time. The NRC subsequently issued Generic Letter 81-38 that includes some additional concerns to be addressed in the safety analysis of storage facilities. The licensee stated that the safety analysis would be revised by March 1986 to incorporate Generic Letter 81-38 concerns. This matter will be reviewed in a future inspection. (85-25-03)

7. ALARA Program Status

The status of the licensee's efforts to complete the implementation of an ALARA program at the corporate level and the preplanning for the February 1986 outage were reviewed against criteria contained in Regulatory Guide



8.8. The licensee has drafted a corporate "ALARA Policy" and a "ALARA/Radiation Safety Design Review" procedure. The policy assigns specific responsibilities and establishes requirements for the ALARA program. The design review procedure (No. QE 325) provides detailed guidance for conducting an ALARA review for personnel engaged in design activities. Both documents are scheduled to be implemented in the spring of 1986.

The licensee continues with an aggressive program to reduce personnel exposure during steam generator (S/G) maintenance. The robot manipulator arm for eddy current testing of S/G tubes has been replaced by a "no jump" design. The tube sleeving method was changed to the GENISIS process after investigation revealed potential dose savings. An automated manway stud detentener has been purchased. A new traveling robot camera with attached vacuum cleaning system was also purchased. These efforts are expected to result in a reduction of approximately 30% in personnel exposure for S/G work during the February 1986 outage.

With the exception of steam generator work, the remaining outage work had not been firmly established. Only one ALARA review was completed.

Within the scope of this review, no violations were identified.

8.0 Exit Interview

The inspector met with the licensee personnel denoted in Section 1.0 on November 22, 1985 to discuss the scope and findings of the inspection. At no time during this inspection was written material provided to the licensee by the inspector.