

Appendix A

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

Based on the inspection conducted on November 8, 9, and 14-16, 1979, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. The noncompliance items are infractions.

1. 10 CFR 20.101(a) places a limit of 1.25 rem per calendar quarter on an individual's occupational dose to the whole body. The exception provided for by 10 CFR 20.101(b), which permits quarterly whole body dose from occupational exposure up to 3 rem if the accumulated whole body dose does not exceed 5 (N-18), does not apply to eighteen-year-old individuals, as "N" is defined as the individual's age in years at his last birthday.

Contrary to the above, the licensee reported by letter dated October 26, 1979, that an eighteen-year-old worker had received 1.7 rems during the third calendar quarter of 1979. This whole body dose exceeds the applicable 1.25 rem limit.

2. Technical Specifications 6.8.1 and 6.11.1 require that radiation protection procedures be implemented and adhered to. Procedure H.P. 8.4, "Whole Body Counting Program," in Section 5.2.1, "Exit Whole Body Counting," states, "All personnel, whether permanent or temporary, will be whole body counted at the time of their film badge termination unless the plant health physicist deems a count not necessary based on the work performed and the area it was performed in by the individual."

Contrary to the above, a worker who had worked in containment and the steam generator during the early part of the current outage was not given a whole body count upon his termination following work on October 8, 1979.

3. 10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as may be necessary for him to comply with the regulation in this part. 10 CFR 20.201(a) defines a survey as used in the regulations to mean an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present.

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Contrary to the above, the licensee failed to make a proper evaluation for the presence of radioactive material in plant refuse being released to a landfill for burial in 1978 and possibly in early 1979.