Consumers Power Company

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December 23, 1980

Mr James G Keppler
Office of Inspection and Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - RESPONSE TO
IE INSPECTION REPORT 80-14

IE Inspection Report 80-14, dated November 28, 1980, transmitted the results of a health physics appraisal conducted in August 1980. The subject report contained two apparent items of noncompliance to which replies are required. In addition, the report identified several "Significant Appraisal Findings" to which replies were requested within twenty (20) days of our receipt of the report. In view of the extensive inspection effort of the health physics appraisal team and the extent of the Significant Appraisal Findings, Consumers Power Company requests an extension until May 1, 1981 to respond. This request is made to permit a meaningful review and evaluation of the health physics program. This effort is expected to result in a substantial and positive response which will correct identified weaknesses.

Responses and corrective actions related to the two items of noncompliance identified in Appendix B to the report are contained in this letter. Subject inspection reports are as follows:

Item 1

10 CFR 20.201(b) requires evaluations as necessary to comply with regulations for the release of radioactive effluents to unrestricted areas.

Contrary to the above, the licensee did not perform a timely evaluation of an airborne release of radioactive material which occurred on August 12, 1980. The release was not quantified until about 14 hours after the event. (Section 11.a)

Response to Item 1

An evaluation of the gaseous release on August 12, 1980 was made to satisfy requirements in 10 CFR 20.201(b).

Event Report E-Pal-80-052 and the Control Room Log reflect that the immediate action taken was effective in isolating the source of the release. This in conjunction with the Shift Supervisor's evaluation that the release monitor readings were at levels experienced in the past without serious consequences was sufficient for him to conclude that further immediate action to protect the public health and safety was not required. Calculations, and additional evaluations initiated at about 0900 on August 12, and completed at about 1800 on August 12, confirmed the preliminary determination made by the Shift Supervisor.

The concern expressed in Section 11.a of the subject inspection report regarding the lack of adequate familiarity of Palisades personnel with the stack noble gas monitor and associated quantifications is acknowledged and the following remedial actions have been taken and are continuing:

1. Calibration information for the stack monitor is posted in the control room area and a typical relationship is used in Emergency Implementation Procedure EI-6, "Estimate of Offsite Dose," which is also available in the control room area.

2. Stack monitor alarm values in monitor readout units are, and were, available in the control room area. Information, including calibration data procedural methods, is now also available to correlate monitor reading to release rate in terms of activity per unit time.

3. Surveillance Procedure DWR-10, titled Stack Effluent Sampling, Calculations and Records, quantifies noble gas effluent in terms of Technical Specifications limits.

4. The stack monitor recorder is difficult to read at low release levels; however, at higher release levels where Technical Specifications limits or emergency conditions would be approached, data points from the monitors of interest trend apart from the data points of noninterest. The current recorder is adequate based on the above considerations. A new stack monitor is scheduled for installation which will record low and high level releases. A computer-supported monitor with CRT readout is also planned to be installed in accordance with the established TMI equipment schedule.

5. On-the-job training of Chemistry/Radiation Protection Technicians in the use and application of Surveillance Procedure DWR-10 is in progress. Under the current weekly program, an inexperienced technician uses the procedure under the direct supervision of an experienced technician to calculate and record that week's effluent quantities. To date, ten or more persons in the Chemistry/Health Physics Department have demonstrated their abilities to use the procedure.

In summary, Consumers Power Company agrees with the inspector's implied conclusion that the time expended in quantifying the August 12, 1980 release was excessive. The corrective actions discussed above were initiated to upgrade our performance in this area. We do not agree, however, that the untimely quantification constitutes an item of noncompliance; neither 10 CFR 20 nor our procedures stipulate how rapidly the release must be quantified. As stated above, an appropriate evaluation of the release was performed promptly by the duty Shift Supervisor; accordingly, we conclude that no noncompliance with NRC regulations existed, and we request that this finding be withdrawn.

Item 2

Technical Specification 6.11.1 requires adherence to radiation protection procedures. The following instances of failure to meet this requirement were identified during the appraisal.

Item 2a

Procedure HP 1.1.5.2.3 requires that personnel leaving a restricted area check for contamination by passing through a portal monitor or by monitoring themselves with a frisker instrument.

Contrary to the above, the Appraisal Team observed several individuals fail to check for contamination when leaving restricted areas. (Section 8.a)

Response to Item 2a

1. A portal monitor will be installed at the radiation control area exit from the auxiliary building to the turbine building near Doors 168 and 169. A frisker is now and has been at this location. The monitor will be installed by June 1981 unless unforeseen equipment procurement problems arise.

2. Periodic reminders to all Plant personnel have been and will be published in the Palisades Daily Orders and weekly bulletin to improve personnel monitoring practices at the radiation control area exits.

3. A permanent personnel radiation monitor and contamination control point including a frisker and portal monitor will be established at the south radwaste storage building by December 31, 1981. Personnel contamination monitoring equipment is currently available at this location.

4. Plant radiation protection personnel will be advised in writing to observe radiation control area exit points for proper personnel exit monitoring practices as part of their routine function while carrying out other duties, to correct improper practices on the spot when observed and to report unsuccessful attempts to correct improper practices to their supervisor for resolution. This will be accomplished by January 15, 1981.

Item 2b

Procedure HP 2.16 specifies that the Plant Health Physicist or Radiation Protection Supervisor or, in their absence, the Shift Supervisor, must approve entries into areas over 1000 mR/hr.

Contrary to the above, the authorizing individual on most High Radiation Area Entry Permits (Form HP 2.16.1) reviewed was a C&RP technician. (Section 8.a)

Response to Item 2b

Procedure HP 2.5, Entry Control for High Radiation Areas over 1000 mR/hr, addresses this topic. The procedure does require the approval as stated in the report. As communicated to the inspectors during the inspection and to the best of our knowledge, the individuals signing the entry permits were assigned duties as the Acting Radiation Protection Supervisor. Generally, upgraded salary levels paid to them for the periods of time they acted in this capacity may be verified by time sheets; therefore, a procedural violation did not exist.

Item 2c

Procedures HP 2.12 and HP 2.17 require that pipes, valves, or other equipment with radiation levels greater than twice the general area levels, and exceeding 75 mR/hr, be tagged with hot spot tags.

Contrary to the above, several unposted hot spots were identified in the primary system drain pump room. (Section 8.a)

Response to Item 2c

Procedure HP 2.17, Status Sheets, addresses the tagging of hot spots in Note 1 of Section 5.1.c. The note reads as follows:

> "If any pipe, valve or other equipment reads > 2 times the general area readings and exceeds 75 mR/hr, it should be tagged with a hot spot tag. General area field is approximately 18" from the hot spot or 18" from the closest accessible point."

Tagging hot spots is the general practice under the Radiation Protection Program as evidenced by the high percentage of such items which are posted; however, such tagging is clearly not a requirement of the procedure or 10 CFR 20.

The hot spots in the primary system drain pump room are currently tagged. Additionally, the hot spots are identified on the area status sheets. Status sheets prior to and during the inspection indicate that the points in question were routinely surveyed and that the piping system radiation levels were changing, probably as a result of the recent start-up following an extended outage. Status sheets from the previous five-month period indicate that hot spots were routinely identified and marked thereon.

The status sheet information is considered the principal means of providing routine data to control and minimize radiation exposure. However, it is the intent of Management to tag a high percenage of hot spots and this intent is and has been communicated to radiation protection personnel.

Item 2d

Procedure HP 2.17 requires that areas with greater than 400 dpm/100 cm^2 loose contamination be posted as contaminated areas.

Contrary to the above, the clean resin room was not posted as a contaminated area, although contamination levels were greater than 400 dpm/100 cm^2 according to licensee surveys. (Section 8.a)

Response to Item 2d

The clean resin room status sheet of August 9, 1980 clearly identified the room as a contaminated area under the section of Form HP 2.17-1 for "Area Classification." Additionally, the present status sheet as well as several previous status sheets, clearly indicates radiation warning tape boundaries at each of the two room entry points. The clean resin room is currently posted as a contaminated area as required.

Procedure HP 1.0, Section 1.1.2.17 states that contamination areas will be boundaried by magenta and yellow radiation tape and posted with a radiation protection status sheet.

Based on the information available, it is not apparent that Procedure HP 2.17 was not followed as stated in the inspection report.

Item 2e

Procedure HP 2.8 requires an operating check of the Eberline PIC-6A, using an eight microcurie cesium-137 source mounted on a table at Access Control.

Contrary to the above, no such check source was located at Access Control. According to licensee personnel, source checks are not routinely performed before instrument use. (Section 9.a)

Response to Item 2e

The procedurally required check source has been located and placed at Access Control. Chemistry/Radiation Protection technicians have been reinstructed in the requirement to conduct the source response check of the PIC-6A instrument prior to use.

Item 2f

Procedure HP 2.40 and BP 2.41 require the labeling of Ludlum 177 and Eberline RM-14 instruments, respectively, with the response to a 0.5 microcurie cesium-137 check source for reference on daily checks of the instrument.

Contrary to the above, several such instruments were not labeled with their check source response. (Section 9.b)

Response to Item 2f

A survey has been made of all Ludlum 177 and Eberline RM-14 instruments. Each instrument in an operable condition has the required label giving the acceptable response range to the procedurally designated check source. Routine response checks of operational friskers on a daily basis have been and continue to be performed and documented in accordance with HP 9.1 (formerly HP 2.1), routine calibration checks. A cross-comparison of these records was performed. The results of this review indicated that instruments in use when checked against the same source gave similar responses within the acceptable tolerances. Based on this, Consumers Power Company considers that instruments in use demonstrated the required accuracy. Review of instrument calibration procedures is being conducted to eliminate internal inconsistencies such as the one described above and will improve the documentation and labeling of instruments.

Summary

Consumers Power Company feels that the information provided above demonstrates an "adherence to radiation protection procedures." Where specific corrective actions are necessary to improve our performance, those actions are identified. Schedules for achieving these improvements are also indicated. During our evaluations of the health physics program, which will address the "Significant Appraisal Findings," additional corrective action may be identified. Results of these evaluations will be provided by May 1, 1981.

Robert Frost

Steven R Frost
Palisades Licensing Engineer

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector-Palisades

CONSUMERS POWER COMPANY
Palisades Plant

IE Inspection Report 80-14
Docket 50-255
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At the request of the Commission and pursuant to the Atomic Energy Act of 1954 and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits our response to IE Inspection Report 80-14, "The Palisades Plant Health Physics Inspection."

CONSUMERS POWER COMPANY

By R. C. Youngdahl
R C Youngdahl, Executive Vice President

Sworn and subscribed to before me this 23rd day of December 1980.

Dorothy H. Bartkus
Dorothy H Bartkus, Notary Public
Jackson County, Michigan
My commission expires March 26, 1983.

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