

Wick W. Schneider
Vice President
Production

Public Service Electric and Gas Company 80 Park Place Newark, N.J. 07101 201/430-7373

September 20, 1979

Mr. Boyce H. Grier
Director of USNRC
Office of Inspection & Enforcement
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

NRC INSPECTION 50-272/79-17
INSPECTION DATE MAY 22-25, 1979
SALEM NO. 1 UNIT

We have reviewed the report of your investigation conducted on May 22-25, 1979, which was transmitted with your letter of August 29, 1979, and received on September 4, 1979. Our response to the items of non-compliance in Appendix A of your Investigation Report is as follows:

Item A, Infraction

Technical Specification 6.11 states, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

1. Administrative Procedure No. 24 "Radiological Safety Program," developed pursuant to the above, requires retraining in Radiation Workers Training Course, RP-1, at a time interval of one year.

Contrary to the above, two individuals were not retrained in the Radiation Workers Course, RP-1, within the required time interval according to a licensee representative.

2. Procedure PD-15.1.012 "Post Operation Debriefing," developed pursuant to the above states "...to keep exposure to radiation as low as practical, it is necessary to learn from the experience of work performed. To insure documentation of such experience, whether good or bad, a critique shall be held after the completion of those tasks deemed radiologically significant. The debriefing should be conducted immediately after the event and should be conducted by a Technical Foreman-Rad Protection."

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Contrary to the above, the Steam Generator Eddy Current test, in which the dose rate was as high as 18 R/hr, was completed on/or about April 25, 1979, and a critique had not been conducted at the time of this inspection.

Reply to Item A, Number 1

1. The cause was a failure of individual departments to take the necessary corrective action concerning overdue personnel.
2. To correct the situation, an RP-1 Overdue Training List has been distributed by the training staff.
3. To prevent future items of noncompliance, the training staff will indicate on the published overdue list the dates when these personnel will be 30 days overdue. At the 30-day point, the training staff will issue a letter to the Health Physics group recommending "pulling" the TLD's issued to these individuals.
4. We are in compliance now. The new policy will begin October 8, 1979.

Reply to Item A, Number 2

1. The cause was an oversight on the part of the Health Physics group.
2. To correct the situation, the Health Physics group has established detailed areas of responsibility for their supervisory personnel.
3. To prevent future items of noncompliance, the Health Physics group is in the process of revising its procedure pertaining to Radiation Exposure Permits to make debriefs a requirement of the permit on tasks deemed radiologically significant.
4. We are in compliance now. The procedure revision will be completed by December 31, 1979.

Item B, Infraction

10CFR 20.203(f) "Containers" states "...each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. A label required pursuant to the above shall bear the radiation caution symbol and the words Caution, Radioactive Material or Danger, Radioactive Material. It shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures."

Contrary to the above, the Instrument Calibrator, located in the Instrument Repair and Calibration Room and containing eight Cesium-137 sources totaling approximately 170 Curies, did not bear a label identifying its radioactive contents on May 24, 1979, as observed by the inspector.

Reply to Item B

1. The cause was a deficient procedure which did not fully address the requirement or assign responsibility to ensure compliance.
2. To correct the situation, the proper label has been attached to the identified instrument calibrator and a specific individual has been assigned responsibility for labeling of sources.
3. To prevent future items of noncompliance, the Health Physics group is in the process of revising the deficient procedure to fully document the requirement and assign responsibility to insure compliance.
4. We are in compliance now. The procedure revision will be completed by December 31, 1979.

Item C, Deficiency

10CFR 19.11, "Posting of Notices to Workers," requires in paragraph (a) that current copies of regulations, licenses, license conditions or documents incorporated into a license by reference, shall be posted by the licensee. Paragraph (b) permits the licensee to post a notice which describes the document and state where it may be examined, if it is not practicable to post the document. Paragraph (d) states, "Documents.... shall appear in a sufficient number of places to permit individuals engaged in licensed activities to observe them on the way to or from any particular licensee activity location to which the document applies...."

Contrary to the above, the appropriate documents or notices describing the documents stating where the documents may be examined, were not posted in the Control Access Area, an area through which licensee employees had to pass going to and from the licensee activities to which the documents applies.

Reply to Item C

1. The cause was interpretation of the requirement. NRC Inspection Notices were posted in areas thought to be appropriate for observation by the majority of employees.
To correct the situation, an additional notice has been posted at the Control Access Area.

Mr. B.H. Grier
Inspection 79-17

- 4 -

9-20-79

3. To prevent future items of noncompliance, all notices presently posted are being reviewed to ensure they are located in appropriate areas.
4. We are in compliance now.

If you require additional information, we will be pleased to discuss it with you.

Sincerely,

F W Schneider
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CC: Director, Office of Inspection
& Enforcement
USNRC
Washington, D.C. 20555