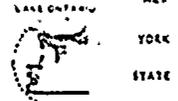




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

LEON D. WHITE, JR.
VICE PRESIDENTTELEPHONE
AREA CODE 716 546-2700

November 11, 1976

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: IE Circular 76-03: Radiation Exposures in Reactor Cavities
R. E. Ginna Nuclear Power Plant, Unit #1
Docket No. 50-244

Dear Mr. O'Reilly:

This letter is in response to Inspection and Enforcement Circular 76-03, dated September 13, 1976 concerning three overexposure events at other facilities.

At Ginna Station there are several areas which fall within the definition of high radiation areas, given in 10 CFR 20.202.b.3 as an area where a major portion of the body could receive a dose greater than 100mrem/hour. According to our Technical Specification 6.13, areas between 100 and 1000mrem per hour must be barricaded and posted. Entry to such areas is controlled by Radiation Work Permits and individuals entering the area must have a continuously indicating radiation monitoring device. Areas in which the radiation intensity is greater than 1000mrem/hour must be locked to prevent unauthorized entry, and the key is controlled by the Shift Foreman.

A review of all areas in the plant which might exceed 100mrem/hour dose level has been made. This includes areas which may change dose level during the various levels of operation of the plant. All areas have been posted and barricaded or locked as required by the dose levels measured or expected. Specifically, the hatch which leads to the area of the incore detector tubes under the reactor has been locked and the key placed under locked area control. This was done in response to overexposures at other plants.

Several plant procedures have been revised so as to make people aware of potential changes in dose rate and to maintain better control of entry to high radiation areas. The procedure for Locked Radiation Areas

DATE November 11, 1979

TO Mr. James P. O'Reilly, Director.

(A-1.1) and the Radiation Control Manual (A-1) have also been revised so as to strengthen the control over these areas. Specific to the area of the incore detector tubes, the procedure for retraction of incore detector thimbles has as an initial condition that the hatch cover be locked in place and posted. A precaution is also given relative to projected dose rates with thimbles out of the reactor. The insertion procedure calls for radiation monitoring during the operation.

In the initial health physics training and annual health physics retraining for personnel working at the station the procedures and requirements for access to controlled areas are explained. The radiation protection technicians are aware of the situations which occurred at other plants and the potential of such occurrences has been discussed with them.

In order to ensure that entry to locked radiation areas is permitted only after management review and approval, keys are not issued without an approved Work Permit. Routine entry is limited to Operators and Radiation Technicians only, and a dose rate meter must be continuously in use during the entry.

Very truly yours,



L. D. White, Jr.