

PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLACHER
MANAGER
ELECTRIC PRODUCTION DEPARTMENT

September 14, 1979

Re: Docket Nos.: 50-277
50-278

Inspection No.: 50-277/79-15
50-278/79-17

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Brunner:

Your letter of August 24, 1979, forwarded Combined Inspection Report 50-277/79-15 and 50-278/79-17. Appendix A to your letter addresses one item which did not appear to be in compliance with Nuclear Regulatory Commission requirements. The item is categorized as an infraction and is restated below with our response.

10 CFR 20.103, "Exposure of individuals to concentrations of radioactive materials in air in restricted areas," requires in Section (C) that when respiratory protective equipment is used to limit inhalation of airborne radioactive material, allowance may be made for such use in estimating exposure provided that such equipment is used as stipulated in Regulatory Guide 8.15. Section C.4.e of Regulatory Guide 8.15 requires that "The licensee is to maintain and implement a respiratory program that includes, as a minimum written operational and administrative procedures for control, issuance, proper use, and return of respiratory protective equipment..."

Health Physics Procedure HPO/CO-9a, Revision 3, dated December 27, 1978, "Respiratory Protection Training and Fitting" describes

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the Peach Bottom Respiratory Protection Training Program. Section 3.0 states, "After completion of training and fitting, the instructor shall complete a respiratory equipment qualification label reflecting the individual's qualifications and the label must be attached to the back of the individual's security badge."

Health Physics Procedure HPO/CO-9, Revision 6, dated December 27, 1978, "Respiratory Protection Program" which describes the licensee's program, Section 4.3 states "Records of training and fitting shall be maintained for documentation and use in program evaluation. A qualification label on the reverse of the security badge shall be used as a means of verifying each individual's qualification."

Contrary to the above, during the week June 11-15, 1979, one individual was identified, whose prior qualification had expired March, 1979, who had been issued a respiratory equipment qualification label valid through 1980 (no monthly expiration date) by a person or persons unknown, without receiving requisite retraining and qualification by an instructor and whose name did not appear on a current Respiratory Qualification List.

Response

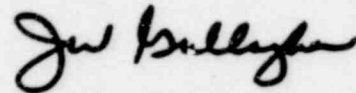
The respiratory equipment qualification labels are preprinted labels wherein the expiration date and appropriate respiratory equipment qualifications are indicated by means of a hole punch. In this case, the incorrect expiration year, 1980, had been mistakenly punched by the person issuing the label.

The individual in question had previously undergone a satisfactory fit test to demonstrate the ability of the respiratory equipment to provide the expected protection. Additionally, the MPC-hour exposure records are calculated based on the current Respiratory Qualification List so that application of a protection factor to an unqualified individual will not occur. For these reasons, it is highly unlikely the individual in question could have been exposed to airborne radiation levels in excess of those recorded.

As immediate corrective action, the production and validation of duplicate or replacement qualification labels, which had been a shared responsibility, has been assigned specifically to the training section. Additionally, a review of all personnel records for respiratory protection was performed to ensure that respiratory equipment qualification labels in the field were correct.

As an additional corrective action, a review of the respiratory protection program and implementing procedures has been commenced. Appropriate program and procedure modifications, as necessary to clarify control of high airborne jobs, MPC-hour calculations and documentation will be completed by January 1, 1980.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Joe Sullivan".

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