

POWER AUTHORITY OF THE STATE OF NEW YORK  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT



JOHN D. LEONARD, JR.  
Resident Manager

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November 20, 1978  
JAFP-78-621

Mr. Boyce H. Grier, Director  
United States Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Docket #50-333 IE Inspection #78-21

Dear Mr. Grier:

With reference to the inspection conducted by Mr. K. Plumlee of your office on September 25-28, 1978, at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of Section 2.201 of Part II of Title 10 of the Code of Federal Regulations we are submitting our reply to Items A & B of Appendix A of the Notice of Violation transmitted by your letter dated October 30, 1978 as received by the undersigned on November 2, 1978.

APPENDIX A

Notice of Violation

Based on the results of an NRC inspection conducted on September 25-28, 1978, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC License No. DPR-59 as indicated below. Items A and B are infractions.

- A. A requirement of Technical Specifications Section 6.11, "Radiation Protection Program," is that procedures for radiation protection shall be adhered to for all plant operations.
1. Contrary to the above on September 27, 1978, radioactive waste measured at up to 10 mr/hr on contact was compacted without adhering to the special instructions of the radiation work permit RWP controlling this operation, that radiation protection be contacted to provide airborne monitoring as required during operation of the compactor.

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2. Contrary to the above at 10:35 a.m. on September 27, 1978, an individual was working in a restricted area of the plant without adhering to the requirement of the Radiation Protection Procedures, Section II.C, to wear his assigned personnel dosimeters in restricted areas.

Response to Item A

1. The Operations Superintendent was promptly notified of the non-conformance with regard to the RWP in effect at the job site for trash compacting. The operators who were compacting trash were reminded of the requirements and were instructed to comply with them. To ensure that other operators were cognizant of the RWP requirements for trash compacting a notice was placed in the plant "night orders" for each shift to read. Subsequent sampling during trash compacting indicated airborne concentrations of approximately seven (7) percent of the maximum permissible concentration (MTC).
2. We believe that this is an isolated incident and that our training program adequately trains personnel at the plant of their responsibilities for wearing dosimetry device. As noted in the inspection report the individual involved had been instructed at the time to always wear his dosimetry devices when in the restricted areas of the plant, but took his shirt off in the work area and inadvertently left the dosimetry devices attached to his shirt. Plant personnel have been instructed through existing training programs that should they see a person without dosimetry that they tell the person to leave the restricted area and report to the Radiation Protection Office.

We believe we are now in full compliance concerning these two items.

- B. A requirement of Technical Specifications Section 6.11(A)2 is that locked doors shall be provided to prevent unauthorized entry into areas in which the intensity of radiation is greater than 1,000 mrem/hr.

Contrary to the above on September 25, 1978. about 11:20 p.m., an unattended high radiation area gate at an entrance to the drywell, an area in which the intensity of radiation is greater than 1,000 mrem/hr, was not maintained locked.

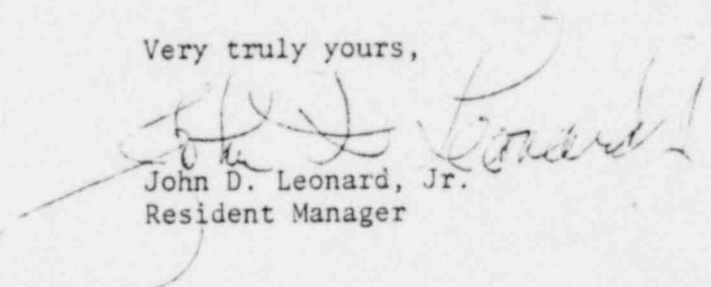
Response to Item B

Although the gate indeed was not locked because it had jammed in the shut position and only appeared to be locked, we believe that this item is not a violation of Technical Specifications (TS) Section 6.11(A)2 because of the following:

TS Section 6.11(A)2 applies to high radiation areas where the radiation dose rate is greater than 1,000 mrem/hr. We have made a thorough search of our records and can find no evidence that there were areas in the drywell where a person could have received a whole body radiation exposure of greater than 1,000 mrem in one hour during the time of the inspection under the shutdown condition then existing. Although there were local "hot spots" where contact readings on a survey meter may indicate greater than 1,000 mrem/hr in each case the dose rate to "a major portion of the body" (per 10CFR20.202) was less than 1,000 mrem/hr. This has been verified by interviews with radiation protection technicians assigned to perform surveys in the drywell at the time of the inspection.

We respectfully request that the status of this item be reviewed by your staff in view of the above.

Very truly yours,



John D. Leonard, Jr.  
Resident Manager

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