

Georgia Power Company
230 Peachtree Street
Post Office Box 4545
Atlanta, Georgia 30302
Telephone 404 522-6060

February 11, 1980

Power Generation Department



U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 310C
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: RFR III
50-321/79-37
50-366/79-41

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

The following is submitted as a reponse to NRC Inspection Report Numbers 50-321/79-37 and 50-366/79-41 concerning one infraction.

INFRACTION

On November 27, 1979, work commenced on the filter element change of "F" filter demineralizer prior to Health Physics and the Shift Foreman's approval and posting of the RWP.

RESPONSE

Upon notification by the inspector that the RWP was not posted, the RWP was taken to the Shift Foreman for review and approval and then taken to the work place and posted. A review of present practices regarding issuance of RWP's was then undertaken and it was concluded that procedure HNP-8008, "Radiation Work Permit", was too restrictive in that it did not allow enough flexibility in controlling work in areas of low contamination, in situations requiring immediate attention, and on jobs where radiation surveys cannot be completed until a system is breached. The procedure was, therefore, revised to allow, for certain jobs and situations, work to commence before a Radiation Work Permit has been completely approved by the Health Physics staff and the Shift Foreman. The approval to work, in these situations, will be contingent on the policy that a Health Physics person will accompany the workers, will perform the necessary radiation monitoring at the work place to protect the workers, and will give the workers proper instructions in radiation protection. The approval to work will also be contingent on the proper clearance and tagging of the equipment by the Shift Foreman and his staff. When all of the information necessary for issuance of the RWP has been collected, the RWP will then be signed and carried to the job site and posted for the duration of the work. The revision of HNP-8008 was approved on January 18, 1980, and full compliance has been achieved.

We do not feel, however, that the incident cited by this infraction warrants the severity assigned to it, because adequate radiation protection was in effect during the time of the incident.

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This demineralizer was the last of seven demineralizers whose filter elements had been changed out in the same time frame. The levels of radioactivity, therefore, were well known by the Health Physics staff and were considered not to be a personnel hazard until the elements were being removed and cut up for disposal. At that time, the RWP would have been posted.

The personnel removing the head of the demineralizer were properly protected with protective equipment to minimize contamination. Two Health Physics technicians were at the work place to provide surveillance and instructions to the workers in radiation safety.

Very truly yours,

W. A. Widner

W. A. Widner
Vice President and General Manager
Nuclear Generation

RDB/mb