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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

March 27, 1980

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

Inspection No.: 50-277/79-21
50-278/79-23

Mr. George H. Smith, Chief
Fuel Facility and Materials Safety Branch
US Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Smith:

Your letter of March 6, 1980, forwarded combined Inspection Report 50-277/79-21 and 50-278/79-23. Appendix A to your letter addresses one item which did not appear to be in full compliance with Nuclear Regulatory Commission requirements. The item is categorized as an infraction and is restated below with our response.

Based on the results of an NRC inspection conducted on September 17-21, 1979, it appears that one of your activities was not conducted in full compliance with NRC regulations as indicated below. This item is an infraction.

- A. 10 CFR 20.103 requires assessments of individual intakes of radioactivity by exposed individuals. Intakes less than those which would result from inhalation for 2 hours in any one day or for 10 hours in any one week at uniform concentrations specified in Appendix B, Table I, Column 1 need not be included in such assessment, provided that for any assessment in excess of these amounts the entire amount is included.

Contrary to the above requirement, intakes in excess of those which would result from inhalation for 2 hours in a day at uniform concentrations specified in Appendix B, Table I, Column 1 of 10 CFR 20 were not made for three individuals exposed on September 18, 1979.

Response

As indicated in the detail section of the inspection report, paragraph 6, this infraction addresses the need to make an assessment of intakes in excess of those which would result from inhalation for 2 hours in a day at uniform concentrations specified in Appendix B, Table I, Column 1 of 10 CFR 20.

Health physics technicians obtain data required to calculate Maximum Permissible Concentration (MPC) hours from radiation work permits as required by procedure. The individual exposures exceeding 2 MPC hours/day involved in this infraction were not assessed and recorded because of an oversight by a health physics technician who failed to process necessary data. As soon as the oversight was identified, the airborne environment associated with the individuals was assessed and recorded in accordance with 10 CFR 20.103 requirements. However, it is important to note that the individual assessments would have been processed later during the routine review of radiation work permits.

It is also important to note that in this particular case the individuals involved were wearing sorbent canisters but no protection for radioactive iodine is claimed in establishing the recordable exposures.

Supervision has reinstructed the health physics technicians in the importance of following procedures in a timely manner to ensure compliance with 10 CFR 20.103.

Very truly yours,

