

WIC



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

JUN 13 1980

Docket No. 50-155

Consumers Power Company
ATTN: Mr. R. B. DeWitt
Vice President
Nuclear Operations
212 West Michigan Avenue
Jackson, MI 49201

Gentlemen:

Subject: Health Physics Appraisal

The NRC has identified a need for licensees to strengthen the health physics programs at nuclear power plants and has undertaken a significant effort to ensure that action is taken in this regard. As a first step in this effort, the Office of Inspection and Enforcement is conducting special team appraisals of the health physics programs, including the health physics aspects of radioactive waste management and onsite emergency preparedness, at all operating power reactor sites. The objectives of these appraisals are to evaluate the overall adequacy and effectiveness of the health physics program at each site and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements but also to improve NRC requirements and guidance. This effort was identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement.

During the period March 3 to March 14, 1980, the NRC conducted the special appraisal of the health physics program at the Big Rock Point Nuclear Plant. Areas examined during this appraisal are described in the enclosed report (50-155/80-04). Within these areas, the appraisal team reviewed selected procedures and representative records, observed work practices, interviewed personnel, and performed independent measurements. We request that you carefully review the findings of this report for consideration in improving your health physics program.

Findings of this appraisal indicate that several significant weaknesses exist in your health physics program. These include, among others, staffing levels, training, procedure adherence, personal contamination control, ALARA formalization, and clarification of the authority delegated to the Health Physics Organization. These items are set forth in Appendix A, "Significant Appraisal Findings." Your past performance

8007240 004:

Q

JUN 13 1980

in personal exposure and radiological effluent controls has been acceptable but we believe that the identified weaknesses require correction to enable you to perform equally well in future normal and offnormal situations. Your present health physics program is considered adequate to support continued operation while achieving acceptable corrective action for the identified weaknesses.

We recognize that an explicit regulatory requirement pertaining to each significant weakness identified in Appendix A may not currently exist. However, to determine whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty (20) days of your receipt of this letter, describing your corrective action for each significant weakness identified in Appendix A, including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

During this appraisal, it was also found that certain of your activities do not appear to have been conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed as Appendix B. The items of noncompliance in Appendix B have been categorized into the levels of severity as described in our Criteria for Enforcement Action dated December 13, 1974. Section 2.201 of Part 2, Title 10, Code of Federal Regulations, requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply, including: (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of non-compliance; and (3) the date when full compliance will be achieved.

You should be aware that the next step in the NRC effort to strengthen health physics programs at nuclear power plants will be a requirement by the Office of Nuclear Reactor Regulation (NRR) that each licensee develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for significant weaknesses identified during the special appraisal of the current health physics program. Guidance for the development of this plan will incorporate pertinent findings from all special appraisals and will be issued by NRR in the fall of this year.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this material

JUN 13 1980


Consumers Power Company

- 3 -

contains any information that you believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit, executed by the owner of the information, which identifies the document or part sought to be withheld and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in Subparagraph (B)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, this letter and the enclosures will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,


James G. Keppler
Director

Enclosures:

1. Appendix A, Significant Appraisal Findings
2. Appendix B, Notice of Violation
3. IE Inspection Report
No. 50-155/80-04

cc w/encls:

Mr. D. P. Hoffman, Nuclear
Licensing Administrator
Mr. C. J. Hartman, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Ronald Callen, Michigan Public
Service Commission

Appendix A

SIGNIFICANT APPRAISAL FINDINGS

Consumers Power Company

License No. DPR-6

Based on the Health Physics Appraisal conducted March 3-14, 1980, the following items appear to require corrective actions. (Section references are to the Details portion of the enclosed Inspection Report.)

1. Technician and professional staffing within the Chemistry and Radiation Protection Department is not sufficient to allow adequate training of personnel, to provide reasonable assurance that personnel loss will not adversely affect essential Chemistry and Radiation Protection Department functions, and to allow adequate performance of assigned responsibilities under routine and anticipated nonroutine conditions. (Section 3.b)
2. Offshift radiation protection coverage requires upgrading to assure that necessary measurements can be made and actions taken in accident or other anomalous situations to evaluate radiological hazards and effect appropriate radiological precautions. The individuals providing this coverage must not be assigned other duties under the emergency organization which detract from their primary responsibility for radiation protection coverage. (Section 3.a)
3. The ALARA program requires significant improvement, especially in the areas of program formalization and Chemistry and Radiation Protection staff authority. (Sections 3.c and 10)
4. The training program requires significant improvement, especially in the areas of Chemistry and Radiation Protection Technician training and RWP-exempt training. (Sections 4.a and b, and 12.a)
5. The RWP-exempt program, in its present form, has significant weaknesses in training of personnel and in basic format. (Sections 4.b and 8.b)
6. Personal contamination monitoring practices require significant improvement in the areas of equipment sensitivities, formal procedures describing equipment calibrations and alarm setpoints, and enforcement of procedures for use of personal contamination equipment. (Sections 8.c and 9.c and d)
7. Airborne effluent controls require improvements in noble gas quantification methods, laboratory ventilation release determinations, and HEPA filter changeout and testing criteria. (Section 11.b)

8. Although not indicative of broad problem areas, significant weaknesses requiring corrective actions were identified in the following areas:

High radiation area access controls. (Section 8.d)

Supply of stand-off (extendible probe), high range survey instruments and survey instrument operability checks before use. (Section 9.a)

Procedure coverage and adherence. (Section 6)

Temporary storage of low-level radioactive trash. (Section 11.c)