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Group 2

DAVIS BESSE SUPPLEMENT #13 AND ITS AFFECTS ON ALAP OCCUPATIONAL
EXPOSURE

Plant Name: Davis-Besse
Licensing Stage: OL
Docket Number: 50-346
Milestone Number: 27-33
Responsible Branch: LWR 2-2
Project Manager: L. Engle
Review Status: Complete

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ORIGINAL

Supplement #13 of the Davis Besse FSAR contains revisions in Chapter 12 which changed some of the applicant's commitments to some safety procedures. These particular revisions were made subsequent to the Radiation Protection Section input to Chapter 12 (Radiation Protection) of the Davis Besse SER and are unacceptable without further information. Consequently, reevaluation of safety positions taken in Chapter 12 of the SER will be required unless the issues in question can be satisfactorily resolved with the applicant in future Davis Besse supplements. The following changes were made by the applicant:

- (1) The applicant's original commitment to whole body counting was to count all personnel who are assigned a permanent personnel monitor who have occasion to work in a radiation access control area. Supplement #13 changed this to selected personnel etc. The applicant should address the criteria for his selection of persons to be counted and specify the fraction of all plant personnel that work in radiation access control areas that those selected would represent.
- (2) ^{131}I alarm levels in containment were changed from 1×10^{-10} $\mu\text{Ci/cc}$ to 1×10^{-7} $\mu\text{Ci/cc}$. This new value would mean personnel exposure could be as high as -10 MPC before alarm actuation. Particulate and noble gas monitoring alarm points were also increased by an order of magnitude or greater. Similar changes were made in the waste gas monitor and the miscellaneous radiological waste systems monitors. These changes are unacceptable.

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The above issues were raised with the applicant via telephone by Leon Engle. Their verbal commitment for resolution of the first issue will be transmitted in a future supplement. The second issue has not been resolved at this time.

We are concerned with the possibility of an applicant submitting supplements to his SAR that might affect SER staff positions with respect to his planning, designing and operating the station in a manner that will assure that occupational exposures will be ALAP.

Hopefully the issue with Davis Besse will be satisfactorily resolved on a single case basis, but if the issue becomes generic, then our actions should likewise be generic.

Original Signed by

H. R. Denton

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