



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

*Central
File*

6/20

Docket No. 50-346
EA-80-37

Toledo Edison Company
ATTN: Mr. Richard P. Crosse
Vice President
Nuclear
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Gentlemen:

The findings of a recent inspection of the radiation protection program at the Davis-Besse Nuclear Power Station, particularly with regard to the overexposure to radiation which occurred near the reactor cavity on April 30, 1980, indicate that sufficient attention has not been given to the control of access to high radiation areas. The inspection findings were discussed with members of your staff at the conclusion of the inspection. On June 4, 1980, the Director of our Region III Office met with you to discuss the circumstances surrounding the April 30, 1980, overexposure and to discuss the three apparent items of noncompliance identified during the inspection. These noncompliances are set forth in the Notice of Violation attached as Appendix A to this letter.

In our view, the items of noncompliance in Appendix A demonstrate a lack of effective radiation exposure control. The potential for a significant personal exposure in reactor cavities was described in IE Circular No. 76-03, "Radiation Exposures in Reactor Cavities," dated September 10, 1976. You were sent a copy of this circular. In addition, a week before the occurrence, an NRC inspector had discussed the potential hazards in the reactor cavity and cautioned your radiation protection management personnel regarding high radiation areas generated by incore instruments removed from the reactor core.

On May 6, 1980, NRC inspectors requested an oral response to IE Circular No. 76-03 at the May 8, 1980 exit meeting. Your written response involving changes to increase Chemistry and Health Physics management control, increase training, and require the use of two different types of high range survey meters for entry into locked high radiation areas is acceptable. Please ensure, however, that these changes and any other changes necessary to control exposure in the reactor cavity and other hazardous areas are promptly and fully implemented.

We consider the April 30, 1980, overexposure to be very serious not only because the actual dose of 4.76 rems exceeded the regulatory limit, but also because of the potential for an extremely large radiation exposure. We are particularly concerned that to some extent this overexposure resulted from

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your failure to act upon a high priority facility change request written in June 1978 to install permanent barricades at reactor cavity access points and the April, 1980 request to relocate the temporary barrier to the proper location. Consequently, we propose to impose civil penalties in the cumulative amount of Thirteen Thousand Dollars (\$13,000) for these noncompliances.

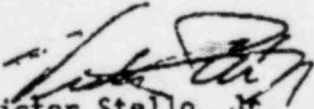
Appendix B of this letter is the Notice of Proposed Imposition of Civil Penalties. You are required to respond to this letter, and in preparing your response you should follow the instruction in Appendix A.

In addition to inadequate preparation and planning, weakness in communication between the senior chem and rad tester and his supervisor, preoccupation with some other assigned radiation protection responsibilities, and a sense of urgency to get the job completed before a planned electrical outage all appear to have contributed to the incident. In responding to the noncompliance items in Appendix A, you should specifically address your plans for strengthening your controls related to the preparation for and management of work in high radiation areas.

Your written reply to this letter and Notice of Violation and the findings of our continuing inspections of your activities will be considered in determining whether further enforcement action, such as additional civil penalties or orders to suspend, modify, or revoke the license, may be required to assure future compliance.

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.

Sincerely,


Victor Stello, Jr.
Director
Office of Inspection
and Enforcement

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Proposed Imposition of Civil Penalties

cc w/encl:
(See next page)

Toledo Edison Company

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cc w/encl:

Mr. T. D. Murray, Station
Superintendent

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