



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

Docket No. 50-219

MAY 19 1980

Jersey Central Power and Light Company  
ATTN: Mr. Ivan R. Finrock, Jr.  
Vice President  
Madison Avenue at Punch Bowl Road  
Morristown, New Jersey 07960

Gentlemen:

Subject: Inspection No. 50-219/80-03

This refers to the inspection conducted by Mr. R. L. Nimitz and Mr. G. P. Yuhas of this office on January 21-25, 1980, at the Oyster Creek Nuclear Generating Station of activities authorized by NRC License No. DPR-16 and to the discussions of our findings held by Mr. Nimitz with Mr. J. L. Sullivan at the conclusion of the inspection, and to subsequent telephone discussions between Mr. D. Turner of your staff and Mr. Yuhas on January 31, 1980 and Mr. J. Devlin of this office and Mr. Carroll on March 10, 1980 and telephone discussions between Mr. Nimitz and Mr. Turner on April 2, 1980.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 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 by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. In addition to the need for corrective action regarding these specific items of noncompliance, we are concerned about the implementation of your management control systems that permitted them to occur. Consequently, in your reply, you should describe in particular, those actions taken or planned to improve the effectiveness of your management control systems.

Item number B, C, and D, shown in the Notice of Violation enclosed with this letter are recurrent items. In your response to this letter please give this matter your particular attention.

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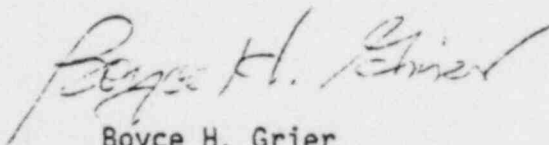
In addition, we are concerned with the implementation of your facility ALARA program. Although your response to Inspection 79-18 addresses ALARA requirements associated with work procedures, the description does not include methods of assuring ALARA concepts are applied to day to day activities and activities not necessarily associated with written procedures. In your response, please address this matter.

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 report contains any information that you (or your contractor) 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, the report will be placed in the Public Document Room.

Additionally, and in accordance with Section 2.790(d) of the NRC's "Rules of Practice, Part 2, Title 10, Code of Federal Regulations, documentation of findings of your control and accounting procedures for safeguarding special nuclear materials and your facility security procedures are exempt from disclosure; therefore, the pertinent section of the inspection report will not be placed in the Public Document Room and will receive limited distribution.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Boyce H. Grier  
Director

Enclosures:

1. Appendix A, Notice of Violation
2. Office of Inspection and Enforcement  
Report No. 50-219/80-03  
(Contains 2.790 Information)

cc (w/o pages 15 and 16 of Report):\*

J. T. Carroll, Station Superintendent  
R. J. Hunter, Manager, Safety and Security

\* Contains 10 CFR 2.790 Information

APPENDIX A

NOTICE OF VIOLATION

Jersey Central Power and Light Company

Docket No. 50-219  
License No. DPR-16

Based on the results of an NRC inspection conducted on January 21-25, 1980, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. Items A, B, and D are Infractions. Item C is a Deficiency.

- A. 10 CFR 20.201, "Surveys", states in Paragraph (b), "Each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part." A survey as defined in Paragraph 20.201(a) means, "an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present."

10 CFR 20.202, "Personnel Monitoring" states in Paragraph (a) that "Each licensee shall supply appropriate personnel monitoring equipment to, and shall require the use of such equipment by . . . (1) Each individual who enters a restricted area under such circumstances that he receives, or is likely to receive, a dose in any calendar quarter in excess of 25 percent of the applicable value specified in paragraph (a) of § 20.101."

Contrary to the above, as of January 25, 1980, individuals entering parts of the restricted area were exposed to intensities of beta radiation up to 1500 mrad/hr and a survey was not performed to determine if appropriate personnel monitoring devices were required or provided pursuant to 10 CFR 20.202.

- B. 10 CFR 20.103(c), "Exposure of individuals to concentrations of radioactive materials in air in restricted areas" requires in part that: When respiratory protective equipment is used to limit the inhalation of airborne radioactive material pursuant to paragraph (b)(2) of this section, the licensee may make allowance for such use in estimating exposure of individuals to such materials provided that such equipment is used as stipulated in Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection."

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Section c.4 of Regulatory Guide 8.15 states in part, "The licensee is to maintain and implement a respiratory protection program that includes, as a minimum...e. Written operational and administrative procedures for control, issuance, proper use, and return of respiratory protective equipment..."

Contrary to the above, as of January 23, 1980, no adequate operational or administrative procedures addressing control and issuance of breathing air fittings was included in the licensee's respiratory protection program. Licensee procedure 915.5 addressed responsibility for this area, however, this guidance was inadequate to prevent improper use of the fittings.

- C. 10 CFR 20.203(f) requires that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The label shall bear the radiation caution symbol and the words

"Caution Radioactive Material"

or

"Danger Radioactive Material"

The label shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof to take precautions to avoid or minimize exposures.

1. Contrary to the above, on January 21, 1980, two 4' x 4' x 6' containers located outside the Old Radwaste Building contained licensed radioactive material and were not labeled and no exemption applied.
  2. Contrary to the above, on January 25, 1980, two 55 gallon drums located on the floor of the torus contained licensed radioactive material and were not labeled and no exemption applied. The drums indicated up to 5000 millirem/hr on contact.
- D. Technical Specification 6.11, "Radiation Protection Program" requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.
1. Procedure 902.7, Revision 1, "Drywell Occupancy and Evacuation During Fuel Handling Operation", developed pursuant to the above, requires in section 5.4 that the alarm set point of the radiation monitors shall have alarm set points set between two and five times the value of the background in the area of the detector.

Contrary to the above, during fuel movement on January 24, 1980, at 9:00 p.m. one of the two radiation monitors, used for evacuation

purposes, was found to have an alarm set point twelve (12) times the value of the background in the area of the detector.

2. Procedure 915.7, Revision 0, "Personnel Monitoring", developed pursuant to the above, states in section 5.3, "the TLD and self-reading dosimeters shall normally be worn in the front of the body between the head and waist".

Contrary to the above, on January 21, 1980, one individual was observed wearing his TLD and self-reading dosimeters suspended about three inches below and behind his belt against the left rear pocket. The individual was operating an instrument calibrator containing 161.4 curies of Cs-137. The location of the dosimeters precluded proper personnel monitoring in the event of the calibrator monitor failure.

3. Procedure 9.11.1, Revision 0, "Radioactive Waste Material Storage", developed pursuant to the above, states in procedure section 5.1, that "all radioactive waste material shall be stored in such a manner so as to reduce to a minimum: ...5.1.2 The radiation exposure dose rates for working personnel."

Contrary to the above, on January 24, 1980, radioactive waste was found at the personnel entrance to the torus and on the torus catwalk emanating contact dose rates of 40 millirem/hr and 3000 millirem/hr, respectively. Personnel, in going to and from their work locations, repeatedly passed by the drums of waste and were at times observed to be leaning against the drums at the torus entrance.