

June 10, 1980

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

SUBJECT: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection No. 80-03

This is in reply to your letter of May 19, 1980 regarding the inspection conducted by Mr. R. L. Nimitz and Mr. G. P. Yuhas on January 21-25, 1980 at the Oyster Creek Nuclear Generating Station. In Appendix A to your letter, there are noted several activities which were not conducted in full compliance with the NRC regulations and conditions of the Oyster Creek NRC Facility License. The specific noncompliances identified and our responses to each are given below:

A. Infraction

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.

B009090 181

Response

1. Personnel were wearing appropriate dosimetry:

- a) Our dosimetry vendor participated in the USNRC sponsored University of Michigan dosimetry study and passed the second round of tests. This information was not available to Oyster Creek Nuclear Generating Station at the time of the inspection.
- b) An evaluation was made of the beta shielding factors for various items of protective clothing and these were applied to the beta to gamma ratio from survey data in each area. It was determined that no individual received greater than 25% of the applicable values in 10 CFR 20.101(a).
- c) We have established a contract for a quality assurance assessment of our dosimeters with an independent third party.

2. Corrective steps to avoid reoccurrence:

- a) See March 17, 1980 letter to Victor Stello, Appendix B, page 33.

B. Infraction

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, "Accepted Programs for Respiratory Protection."

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... 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.

Response

1. Corrective steps which have been taken since the time of the inspection:

- a) Letters were sent to Materials Management and the Oyster Creek warehouse giving instructions to stop all departments except Radiation Protection from ordering or receiving breathing air fittings.

- b) A complete site audit was performed and all breathing air fittings used for other purposes were confiscated.
- c) Issued instructions which require that an operations tag be installed on all service air fittings in use for breathing air purposes.

2. Corrective steps taken to avoid reoccurrence:

- a) Fittings from respiratory equipment to breathing air manifold distribution boxes are presently incompatible with all other station equipment.
- b) Procedure 915.5, "Respiratory Protection", paragraph 3.5 has been revised to state that all air fittings (1/4" Schrader and 3/4" Bowes) used with breathing air can only be purchased by and issued to Radiation Protection Department personnel.
- c) Oyster Creek Nuclear Generating Station has ordered and will install service air to manifold fittings which are incompatible with all other station equipment.

3. Full compliance was achieved February 1, 1980.

C. Deficiency

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.

Response

1. Corrective steps which have been taken:
 - a) The containers were labeled immediately, and properly shipped for disposal.
 - b) Radiation Protection Supervisors and technicians were reinstructed in the requirements for properly labeling all radioactive materials containers.
 - c) Laborers carrying bags of trash to containers were instructed to notify Radiation Protection prior to filling compactible containers.
2. Corrective steps which will be taken to prevent reoccurrence:
 - a) See March 17, 1980 letter to Victor Stello, Attachment B, page 35, Radwaste Management; page 27, item 1.c, Audits; page 24, page 25, Training.
3. Full compliance was achieved January 25, 1980.

D. Infraction

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 PM 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.i, 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.

Response

1. Corrective steps which have been taken:

- a) The dose rates in the drywell were verified, the alarm set points adjusted, and the radiation protection technicians reinstructed.
- b) The individual was reinstructed in the proper location for wearing dosimetry. All on-site personnel including contractors were reinstructed by the Supervisor-Radiation Protection and the Site Manager.
- c) Additional labor was hired to transport radioactive waste in an expeditious manner. All on-site personnel, including contractors were reinstructed by the Supervisor-Radiation Protection and the Site Manager.

Corrective Steps which will be taken to prevent reoccurrence.

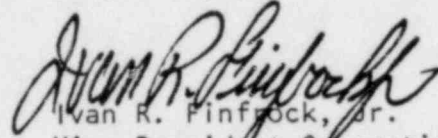
Items a) through c) are examples of failure to follow procedures. As part of the "Radiation Protection Plan" issued April 15, 1980, verbatim compliance to radiation protection procedures is required by all personnel on site and appropriate compliance is being enforced.

ALARA concepts are being applied to day-to-day activities and activities not associated with written work procedures as follows:

1. Training of Radiation Protection Technicians in enforcement and control techniques.
2. Issuance of Radiation Work Practices Manual which includes several ALARA instructions, for example #107, entitled "Responsibilities of an individual in a High Radiation Area".

3. Improved training of radiation workers including mock-up training where applicable.

Very truly yours,



Ivan R. Pinrock, Jr.
Vice President-Generation

ck