

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

August 21, 1980

Re: Docket Nos. 50-277
50-278

Inspection Nos.: 50-277/80-01
50-278/80-01

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Brunner:

Your letter of July 31, 1980, forwarded combined Inspection Report 50-277/80-01 and 50-278/80-01. Appendix A to your letter addresses one item which did not appear to be in full compliance with Nuclear Regulatory Commission requirements. The item is categorized as an infraction and is restated below with our response.

- A. Technical Specification 6.11, "Radiation Protection Program", requires that procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel exposure.

Health Physics Procedure HPO/CO-10a - "Conduct in Controlled Areas - Minimize Exposure", Revision 2 dated May 10, 1978, states in part, "1. Always wear personnel dosimetry... 2. Signs...are posted at various areas to alert personnel to the radiation conditions..."

Contrary to the above, on January 7, 1980, one of two individuals working in the Unit 2 Hot Tool Room, a controlled

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area in the Unit 2 Reactor Building was found not wearing his provided personnel dosimetry (Eberline TLD, Harshaw and self-reading dosimeter). Further, this area was posted as requiring a Radiation Work Permit and no RWP was in effect.

Response

Upon notification of this violation by the Nuclear Regulatory Commission Inspector, an immediate investigation was conducted by the station Health Physics Supervisor. His investigation revealed that two individuals were performing work in an area that was posted as requiring a Radiation Work Permit (RWP) and that one of these individuals was not wearing his dosimetry.

Prompt corrective action taken included cessation of work activity, resurvey of the work area, evaluation and dose adjustment of the individual's radiation exposure history, counseling of individuals involved by Health Physics Supervisor, and involvement of the Maintenance Foreman in the investigation.

The individual without dosimetry was sent to the Dosimetry and Bioassay Office to complete documentation which would allow the addition of an estimated exposure to his record. The estimated exposure (5 mR) was based on the dosimetry reading of the second individual involved in the violation which was more conservative than the estimated exposure based on the results of the area survey.

A meeting was convened the same day with the Engineer-Health Physics, the Health Physics Supervisor, the Maintenance Foreman, and the two individuals involved; a Philadelphia Electric Company maintenance craftsman and a Henkels & McCoy laborer. This meeting established that the maintenance craftsmen failed to follow station procedures concerning RWP's, and that he left his dosimetry in his jacket which had been removed because of the high temperatures in the area.

In April, 1980, a training program to re-familiarize contractor and utility personnel with Health Physics related procedures and information was conducted to avoid occurrences of this type.

Very truly yours,

