



TIC

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

SEP 12 1980

In Reply Refer To:

RII:CMH

50-321/80-27

50-366/80-27

Georgia Power Company
ATTN: J. H. Miller, Jr.
Executive Vice President
270 Peachtree Street
Atlanta, GA 30303

Gentlemen:

Subject: Health Physics Appraisal

During the period of June 16-27, 1980, NRC conducted a special appraisal of the health physics program at the Hatch facility. This appraisal was performed in lieu of certain routine inspections normally conducted in the area of health physics. Areas examined during this appraisal are described in the enclosed report (50-321/80-27 and 50-366/80-27). Within these areas, the appraisal team reviewed selected procedures and representative records, observed work practices, and interviewed personnel. It is recommended that you carefully review the findings of this report for consideration in improving your health physics program.

The appraisal conducted at the Hatch facility was part of the NRC's general program to strengthen the health physics program at nuclear power plants. As a first step in this effort, the Office of Inspection and Enforcement is conducting these special appraisals of the health physics programs at all operating power reactor sites. These appraisals were previously identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement. One of the objectives of the health physics appraisals is to evaluate the overall adequacy and effectiveness of the total health physics program at each site and to identify areas of weakness that need to be strengthened. We also intend to use the findings from these appraisals as a basis for improving in NRC requirements and guidance. Consequently, our appraisal encompassed certain areas which may not be explicitly addressed by current NRC requirements. The next step that is planned in this overall effort will be the imposition of a requirement by the Office of Nuclear Reactor Regulation (NRR) that all licensees develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for any significant weaknesses identified during the special appraisals of the current health physics program. Guidance for the development of this plan will incorporate pertinent findings from the special appraisals and will be issued by NRR in the fall of this year.

The findings of this appraisal at the Hatch facility indicate that, although your overall health physics program is adequate for present operations, several significant weaknesses exist. These include the following:

8011050 512

SEP 12 1980

- a. Staffing problems within the radiation protection organization, such as inadequate number of first-line supervisors, lack of technical support personnel and technician retention have not been satisfactorily addressed and resolved.
- b. A formal on-the-job training and qualification program which would develop well trained and proficient health physics technicians has not been developed and implemented.

These findings are discussed in more detail in Appendix A, "Notice of Significant Appraisal Findings". We recognize that regulatory requirements pertaining to the significant weaknesses identified in Appendix A may not currently exist. However, to assist us in determining whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty (20) days of your receipt of this letter describing your corrective action for the significant weakness identified in Appendix A, including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

The findings of this appraisal also indicate certain activities which apparently were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation enclosed herewith as Appendix B. The items of noncompliance in Appendix B have been categorized into the levels of severity as described in our Criteria For Enforcement Action dated December 1, 1974. Section 2.201 of Part 2, Title 10, Code of Federal Regulations, 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.

Deficiencies in your contamination control program at the Hatch facility were discussed with you by telephone on July 2 and July 3, 1980 by R. C. Lewis of the Region II office. The results of this conversation and our understanding of your planned corrective action were also discussed in a letter to you from James P. O'Reilly dated July 3, 1980. You are requested to include in your response to the significant inspection findings discussed in Appendix A, the status of corrective actions you have taken or will take to alleviate the deficiencies in the contamination control program at the Hatch facility.

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 material contains any information that you 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, this letter and the enclosures will be placed in the Public Document Room.

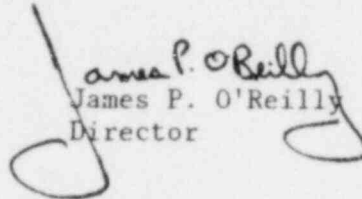
SEP 12 1980

Georgia Power Company

-3-

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

Sincerely,


James P. O'Reilly
Director

Enclosures:

1. Appendix A, Notice of Significant Appraisal Findings
2. Appendix B, Notice of Violation
3. Office of Inspection and Enforcement
Inspection Report Nos. 50-321/80-27
and 50-366/80-27

cc w/encl:

M. Manry, Plant Manager
C. E. Belflower, Site QA Supervisor
W. A. Widner, Vice President and
General Manager-Nuclear Generation

SEP 12 1980

APPENDIX A

NOTICE OF SIGNIFICANT FINDINGS

Georgia Power Company
Hatch facility

License Nos. DPR-57
NPF-5

Based on the Health Physics Appraisal conducted June 16-27, 1980, the following items appear to require corrective actions.

- A. The health physics section of the Health Physics/Laboratory Department does not have a sufficient number of first-line supervisors to provide day-to-day direction to the health physics technicians needed to assure that the plant has an aggressive and effective radiation protection program. Many of the examples of failure to follow procedures discussed in Appendix B and other deficiencies in the plant's radiation program can be attributed to inadequate supervision of the health physics technicians. The need to reduce the technician-to-first-line supervisor ratio will be even more critical if the experience level of the technicians declines further due to the continued loss of experienced technicians.
- B. The Health Physics/Laboratory Department does not have experienced professional personnel on the staff, without supervisory responsibilities, who could provide technical support to the staff in such areas as training of the health physics staff, investigating abnormal radiological occurrences, developing and implementing a formal ALARA program and conducting performance audits or assessments of the plant's radiation protection program. The performance of technical/engineering matters by other than supervisory personnel would permit the supervisors to adequately perform their assigned responsibilities under normal conditions and to prepare for anticipated off-normal conditions. Also, the performance of technical engineering tasks by the supervisor of chemistry and health physics has reduced significantly the time he has available to assess and manage the plant's overall radiation protection program.
- C. Failure to identify and correct the cause of the high turn-over rate of health physics technicians, along with the failure to have an effective on-the-job training program for new technicians has resulted in a significant decline in the number of experienced qualified technicians. Failure to have an effective on-the-job training program has resulted in technicians being assigned tasks for which they have little training and the assignment of personnel to responsible positions prior to completing the qualification program for the position.
- D. The audit and surveillance program at the plant does not include performance audits or assessments of the plant's overall radiation protection program. Many of the problems discussed in the report would probably have been identified during an audit or assessment of this type. The assessment should be performed by individuals with extensive operational radiation protection experience.