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YANKEE ATOMIC ELECTRIC COMPANY

WYR 75-48

20 Turnpike Road Westborough, Massachusetts 01581

April 25, 1975

United States Nuclear Regulatory Commission
Region I
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: James P. O'Reilly, Director

Reference: (a) License No. DPR-3 (Docket No. 50-29)
(b) DRO Inspection Report No. 50-29/75-02
(c) Proposed Change 112, January 3, 1974

Dear Sir:

This letter is written in response to your letter dated April 1, 1975, in which you stated that certain of our activities appear to be in violation of AEC requirements. These items were reported as the result of a routine unannounced inspection of the Health Physics operations at Yankee Atomic Electric Company at Rowe, Massachusetts.

Information is submitted as follows in answer to the alleged violations contained in the enclosure to your letter:

A. Contrary to Technical Specification D.1:

1. Procedure OP8106 and OP8415 were not followed in the following instances:

(a) RWP 1652 and 1659 (1974) authorized workers to receive 600 mr/week without specific, written authorization of the plant health physics representative to exceed the administrative limit of 300 mr/week.

(b) RWP 448 (1974) required the use of a breathing zone air sampler but none was used.

(c) RWP's 448, 498, 493 and 585 (1974) had the required H.P. signature rendered by a temporary contractor health physics technician who was not a member of the health physics department nor was he formally designated by procedure or written authorization to sign RWP's.

(d) RWP's 585, 620 and 634 (1974) did not require continuous health physics coverage, continuous air samples, or breathing zone air samplers as required by procedure for work on coolant loop No. 1. Furthermore, RWP 585 (1974) had been altered as to working conditions and work location by someone other than the health physics representative.

(e) RWP's 459, 466 and 501 (1974, for work in the waste storage building did not require a continuous air sample or a breathing zone air sampler as required by procedure.

2. Procedure OP8302 for release of radioactive material from the controlled area was not followed when environmental monitoring devices were removed from the plant for some period in October, 1974. One device was contaminated with sufficient radioactive material to give a film badge reading of 1900 mrem in 3 weeks.

B. Contrary to 10 CFR 20.201(b):

1. The licensee failed to make such surveys as were necessary to assure compliance with 10 CFR 20.101(a) in that he did not conduct a survey of the fan room sufficient to detect the presence of radioactive materials found in various locations during the inspection, with readings up to 40 mrem/hr at 18 inches, and to permit posting and labeling required by 10 CFR 20.203. This matter was identified and brought to the attention of the appropriate persons by the inspector on three consecutive dates.

2. The licensee failed to make such surveys as were necessary to assure compliance with 10 CFR 20.103 when workers were permited to work under RWP's 18, 20, 23, 32, 45 and 47 (1975) inside of primary systems components without any evaluation as to concentrations of airborne radioactive material.

Although they differ considerably in detail, Yankee believes that each of the foregoing infractions occurred as a result of a lack of training of the individuals involved. The training required to correct these problems must cover two major areas: 1) contents of procedures, and 2) their practical implementation. To this end, AP 9000, "Training of Chemistry and Health Physics Department Personnel", is currently in the review process. When issued, this procedure will specifically outline the training required for every individual who must operate within the guidelines of the plant procedures.

In addition, tighter supervisory controls over Radiation Work Permits and radiation surveys have been instituted by 1) allowing only J. Flanagan, Plant H.P., I. Seybold, Health Physics Engineering

Assistant, and B. Bouker, Chemist to sign an RWP, 2) requiring the Plant Health Physicist and B. Bouker to review all radiation surveys daily, and 3) requiring the Plant H.P. to review all Radiation Work Permits weekly.

C. Contrary to Technical Specification D.2.g(3) the effluent monitor for the incinerator stack has been removed and placed in another location.

The effluent monitor referenced in Technical Specification D.2.g(3) is required to be in continuous service in order to provide an alarm and a record in the event of the release of radioactive gas from the waste disposal blanket gas system through the loop seal. Greater sensitivity of this monitor was achieved by moving it to its present location immediately downstream of the loop seal, where it sees the full concentration of waste gas rather than a diluted sample in the incinerator stack.

Monitoring of incinerator stack effluents is presently achieved through implementation of OP 2303, "Burning of Solid Combustible Wastes", which requires that incinerator stack effluents be sampled continuously and analyzed hourly when burning. Further, upon completion of Engineering Design Change Request 74-3, expected completion date: November 1975, the incinerator stack will be made to discharge through the Plant Vent Stack, where a sophisticated stack monitoring system will continuously monitor all effluents. EDCR 74-3 implementation will bring the incineration evolution into compliance with the provisions of the Yankee Rowe Technical Specifications as specified in Proposed Change 112, dated January 3, 1974.

We acknowledge the concern expressed in your cover letter to the Inspection Report relative to the management control system for radiation protection at Yankee Rowe. We feel that the corrective action as described previously in this letter will augment the existing control system. In addition, we are currently in the process of evaluating the most effective manner by which the management control system can be strengthened. This process involves a management analysis of the current staffing and relationships between the plant and the Health Physics Group at Westboro. Upon conclusion of this analysis, necessary corrective action will be implemented.

We trust that you will find this response satisfactory; however, if you desire additional information, feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

J. L. French
Manager of Operations

JLF/kg