

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION I

Report No. 50-219/80-23

Docket No. 50-219

License No. DPR-16 Priority -- Category C

Licensee: Jersey Central Power and Light Company

Madison Avenue at Punchbowl Road

Morristown, New Jersey 07960

Facility Name: Oyster Creek Nuclear Generating Station

Inspection At: Forked River, New Jersey

Inspection Conducted: May 28 - July 11 and 29, 1980

Inspectors: [Signature] for
Karl E. Plumlee, Radiation Specialist

8-13-80
date

[Signature] for
John A. Thomas, Resident Inspector

8-19-80
date

Approved by: [Signature]
Peter J. Knapp, Chief, Radiation Support
Section, FF&MS Branch

date
8-13-80
date

Inspection Summary:

Inspection on May 28 - July 11, 1980 (Report No. 50-219/80-23)

Areas Inspected: Special, announced inspection by one regional based inspector of the radiation protection program, and routine unannounced inspection by a resident inspector of the extended plant outage. Areas inspected were: actions on previous inspection findings and commitments to the Director, IE, and to the Director, Region I; radiation work procedures and practices; respiratory protection; plant procedures; plant decontamination and house-keeping; equipment surveillance; and licensee events. The inspection involved 260 inspector-hours on-site by one regional based inspector and 60 hours by one resident inspector.

Results: Of the six areas inspected, no noncompliance were identified in five areas; one item of noncompliance was identified in one area (infraction - lack of an adequate mechanism for issuance of management instructions required by Technical Specification 3.12.E.2; Paragraph 9).

DETAILS

1. Persons Contacted

Jersey Central Power and Light Company (JCP&L)

D. Arbach, Radiological Support Supervisor
B. Barrett, Training Supervisor
*J. Carroll, Station Manager
I. Finfrock, Jr., Vice President, Generation
S. Fuller, QA Engineer
W. Garvey, Director, Station Administration
D. Kaulbach, Supervisor of Services
J. Maloney, Operations Supervisor
D. Ross, Manager, Generation, Nuclear
L. Smialek, Radiological Engineering Supervisor
W. Spoulos, General Foreman
J. Sullivan, Unit Superintendent
*D. Turner, Radiation Protection Supervisor

Other Personnel

General Dynamics Corporation (Electric Boat)

N. Gannon, Acting Group Supervisor, Field Operations (Radiation Protection)
B. Watson, Radiological Engineer

General Public Utilities Corporation (GPU)

R. Heward, Director, Radiological Controls
T. Miller, QA Engineer

Institute for Resource Management (IRM)

Dr. B. Leonard, President
Ms. K. Bryan, Site Coordinator

Metropolitan Edison Company (Met Ed)

T. Mulleavy, Acting Radiation Protection Training Coordinator

Nuclear Support Services (NSS)

E. Clements, Acting Group Supervisor, Field Operations
R. Garland, Acting Group Supervisor, Radiological Support

* denotes presence at the management interview conducted on July 29, 1980, at 9:30 a.m., at the licensee's convenience, to review the inspection findings for the period May 28 - July 11, 1980.

2. Licensee Action on Previous Inspection Findings

The inspector reviewed procedures and records and conducted daily tours throughout the plant to verify the licensee's continued adherence to procedures, the adequacy of procedures and practices, and the completion of commitments in each of the following areas. No remaining items of noncompliance were identified in these areas and all commitments referred to below were met. Examples of applicable procedures, records and inspection criteria are referenced below.

(Closed) IE Circular (76-Ci-03): Control of personnel exposures in reactor cavities. References - licensee reply, November 8, 1976; Procedure No. 108, Revision 20, June 18, 1980, "Equipment Control"; and Procedure No. 915.1, Revision 5, May 27, 1980, "Restriction of Access into Radiation Control Areas".

(Closed) Inspector Follow Item (76-30-01): Verify the inclusion of adequate acceptance criteria in the health physics instrument calibration procedures. References - Procedures in series numbered 795.3.001 to 795.3.025, titled, "Calibration of ..." as listed in Paragraph 3 of this report.

(Closed) Inspector Follow Item (76-30-02): Review the radiological controls in Procedure No. 314.3.1. This procedure has been terminated. Provisions requiring the presence of the Health Physics member or his designated alternate during all PORC reviews of procedures involving potential radiological hazards by the PORC Chairman's memo dated July 20 and September 12, 1979, and Administrative Procedure No. 102, Revision 9, January 15, 1980, "Organizational Responsibility", Section 4.2.4.10.

(Closed) Item of Noncompliance (76-32-01): Adherence to procedure requiring periodic functional tests of the "friskers" used to monitor for radioactive contamination on personnel and equipment when leaving contaminated areas. Criteria - Licensee Instruction No. 7.7, May 8, 1980, "Friskers"; Procedure No. 795.3.015, Revision 1, April 15, 1980, "Calibration of the RM-14"; and Procedure No. 112.2, Revision 0, November 9, 1979, "Calibration and Maintenance of Radiation Protection Instruments", Section 5.2.2 requiring a daily functional check prior to use.

(Closed) Inspector Follow Item (77-DN-01): Review correspondence and dosimetry records of contractor employees for compliance with 10 CFR 20.408. Criteria - records of ten recently terminated contract employees were reviewed for compliance with requirements of 10 CFR 20.408 and 20.409 (Refer to item 78-09-10 below).

(Closed) Items of Noncompliance (77-01-01, 77-13-03, 78-09-08, 78-23-04 and 78-27-05): Control of high radiation areas. Criteria - Technical Specifications 6.13.1 and Procedure Nos. 108 and 915.1 above.

(Closed) Items of Noncompliance (77-13-01 and 78-05-06): Posting of radiation areas. Criteria - 10 CFR 20.203(b).

(Closed) Item of Noncompliance (77-13-02): Survey requirements. Criteria - Technical Specification 3.6, "Radioactive Effluents", and 10 CFR 20.201(b) [surveys necessary to comply with 10 CFR 20.101(a); 10 CFR 20.103(a)(3); 10 CFR 20.106; 10 CFR 20.201(b); and 10 CFR 20.203(b), (c), (d), (e) and (f).]

(Closed) Item of Noncompliance (77-13-04, 78-09-03, 78-23-01, 78-27-01 and 78-27-06): Adherence to procedures. Criteria - Procedure No. 102, Revision 3, October 2, 1979, "Training of Nuclear Generating Station Personnel", Sections 5.3 and 5.5; and, No. 903.2 and 915.7, "Personnel Monitoring..."; 915.5, Revision 11, June 20, 1980, "Respiratory Protection"; 915.12, Revision 2, June 20, 1980, "Radiation Work Permit"; Procedure Nos. 907.11 - 907.13, "Air sampling..."; an instruction dated February 9, 1979, "Spot checking of laundered clothing"; TLD reader log sheets; Procedure Nos. 906.7, "Reading TLDs"; 906.14, "Spike TLDs"; 906.18, "Startup and Preoperational Checkout of the 9100 TLD Reader"; 906.19, "Reading TLDs on the 9100 TLD Printer"; 906.20, "Calibration of the 9100 TLD Reader"; and training records.

(Closed) Items of Noncompliance (77-13-05 and 78-23-05): Labeling of containers of radioactive materials. Refer to item 77-13-02 above.

(Closed) Unresolved Item (77-19-02): Employee concern that delays in emergency evacuations could result from delays in opening locked enclosures. Reference - Security Procedure No. 905.37 which has provisions for opening specified locked areas during evacuations; licensee backup arrangements; and the report on the emergency evacuation drill conducted November 30, 1979.

(Closed) Inspector Follow Item (77-30-01): Verify adequate housekeeping in radwaste building. References - plant-wide cleaning during June and July, 1980; replacement of a section of the penthouse wall following wind damage, June, 1980 (New Radwaste Building); removal of prematurely solidified urea-formaldehyde from polymer storage tank.

(Closed) IE Circular 78-03 and IE Bulletin 79-19 (78-Ci-03 and 79-Bu-19): Packaging of low level radioactive materials for transport and burial. References - licensee QA procedures; container certificates of compliance; Procedure No. 912.1, Revision 1, April 14, 1980, "Shipment of Radioactive Material"; and shipping records.

(Closed) Item of Noncompliance (78-05-05): Excessive radiation levels in an unrestricted area. References - letters dated May 30, and July 11, 1978; Procedure No. 915.1, Revision 5, May 27, 1980, "Restriction of Access into Radiation Control Areas".

(Closed) Item of Noncompliance (78-05-09): Failure to maintain an approved written calibration procedure for the portal monitors used at exits from radioactive materials areas. References - Procedure Nos. 795.3.015 (above) and 795.3.008, Revision 1, January 30, 1980, "Calibration of Portal Monitor PMP-4".

(Closed) Inspector Follow Item (78-09-01): Review access controls to TIP room. Reference - Procedure No. 108 (above), specifying that the shift supervisor maintain direct control over the one key to the TIP room, and this key be kept in a secure key cabinet.

(Closed) Item of Noncompliance (78-09-02): Failure to transmit an ISRG annual audit report to plant management within the 30-day requirement of Technical Specification 6.5.3.6. Reference - subsequent report submittals; and QA Department audit requirement.

(Closed) Item of Noncompliance (78-09-04): Failure to adhere to a QA plan housekeeping requirement on the storage of combustible waste.

(Closed) Items of Noncompliance (78-09-05, 78-23-02 and 78-23-03): Failure to meet requirements of 10 CFR 20.103. Reference - Procedure No. 915.5, Revision 9, May 27, 1980, "Respiratory Protection", and "Oyster Creek Respiratory Protection Program - Program Description", April 15, 1980.

(Closed) Item of Noncompliance (78-09-06): Failure to post a radioactive materials area in accordance with 10 CFR 20.203(e)(1).

(Closed) Item of Noncompliance (78-09-07): Failure to post a "notice of violation" in accordance with 10 CFR 19.11(a)(4) and 10 CFR 19.11(e).

(Closed) Item of Noncompliance (78-09-10): Failure to submit reports required by 10 CFR 20.408/.409. Refer to item 77-DN-01, above.

Note: The status of the items of noncompliance identified in Inspection Nos. 50-219/78-23 and 50-219/78-27 is summarized in Attachment 1 to this report.

3. Procedures

The inspector reviewed the following current procedures during the conduct of the inspection, in the depth necessary to determine the status of one or more licensee commitments involving each procedure. In every case commitments were found to have been met. The inspector had no further questions in this area.

<u>Procedure No.</u>	<u>Revision No.</u>	<u>Date</u>	<u>Title</u>
101	9	1/15/80	Organization and Responsibility
102	3	10/2/79	Training of Nuclear Generating Station Personnel

<u>Procedure No.</u>	<u>Revision No.</u>	<u>Date</u>	<u>Title</u>
112	0	11/9/79	Oyster Creek Calibration and Maintenance Protection Instruments
795.3.001	1	4/24/80	Multiple Gamma Source Calibrator
795.3.002	2	2/12/80	Calibration of Teletector Model 6112
795.3.003	0	11/23/79	Calibration of Xetex 302
795.3.004	0	11/23/79	Calibration of PIC 6A
795.3.005	1	4/24/80	Calibration of RO-2 and RO-2A
795.3.006	0	11/27/79	Calibration of PNR-4 Neutron REM Counter
795.3.007	0	11/27/79	Calibration of PRM-6 Alpha Meter
795.3.008	1	1/30/80	Calibration of Portal Monitor Model PMP-4
795.3.011	2	6/27/80	Calibration of Radeco High Volume Air Sampler Model H-809 V
795.3.012	0	11/30/79	Calibration of Eberline RAS-1 and RAP-1 Air Samplers
795.3.013	0	11/27/79	Calibration of the E-530 GM
795.3.015	1	4/15/80	Calibration of the RM-14 GMS
795.3.016	0	11/28/79	Calibration of the RM-16
795.3.017	1	12/21/79	Calibration of the P-4000A Lapel Sampler
795.3.023	0	4/11/80	Calibration of the Eberline E-120 GM
795.3.024	0	4/24/80	Calibration of the E-520 GM
795.3.025	0	6/24/80	Calibration of Portable Continuous Air Monitor Model AMS-3
901.7	0	6/12/78	Time Schedule for Radiation Protection Activity or Function
902.3	1	9/11/79	Replacement of Faded Signs
903.2	13	4/30/80	Personnel Monitoring (issue)
903.6	14	7/5/80	Personnel Regulations
903.8	1	6/30/79	Cumulative Quarterly Exposure Report
903.9	1	11/10/78	Daily Exposure and Access Control Card
906.7	1	5/22/78	Reading TLDs
906.10	2	5/27/80	Receipt and Posting Data
906.14	1	5/22/78	Spike TLDs
906.18	1	4/30/80	Startup and Preoperational Checkout of the 9100 TLD Reader
906.19	0	1/11/79	Reading TLDs on the 9100 TLD Printer
906.20	0	1/11/79	Calibration of the 9100 TLD Reader
906.21	0	1/11/79	Backup Area Calibration for 9100 TLD
907.11	4	4/27/79	Air Sample Using a Low Volume Sampler
907.12	6	7/5/78	Air Sample Using a Marinelli Beaker
907.13	0	12/1/75	Air Sample Using a High Volume Air Sampler
908.20	0	3/12/76	Use of Condenser R-Meter
913.1	0	10/3/78	Vendor Health Physics Control Station General Responsibilities
914.1	1	9/11/78	Health Physics Forms

<u>Procedure No.</u>	<u>Revision No.</u>	<u>Date</u>	<u>Title</u>
915.7	0	7/5/79	Personnel Monitoring (utilization and administration limits)
915.10	1	6/3/80	Investigation of Radiation Incidents
915.13	0	6/18/80	Radiological Deficiency Reduction Program

4. Plant Decontamination and Housekeeping

The inspector observed as many as 130 individuals engaged in decontamination, loose radwaste and trash removal, waste compaction and packaging and application of shielding or protective covering.

Because of limitations on processing of radioactive liquid waste (partly the result of inadvertent solidification of urea-formaldehyde in the polymer storage tank and associated piping) the use of liquid decontaminants was strictly limited.

Decontamination work was continuing at the end of the inspection period.

5. Radiation Protection Staffing

The licensee replaced about 30 contract radiation protection technicians during June 1980, in the course of contract negotiations that resulted in a change of contract agencies.

The inspector observed that (with either contract agency) the availability of technicians generally limited the number of jobs in progress. The licensee systematically assigned job priorities for the available resources.

6. Respiratory Protection Program

The inspector noted that the supply of available clean respirators was strictly limited during June because of the limitation on use of liquid for cleaning the used respirators (see paragraph 4).

No items of noncompliance were identified involving respiratory protection.

7. Availability of Air Samplers and Survey Instruments

The inspector observed during June 1980, that the available operable air samplers and survey instruments were so few that jobs were delayed while technicians searched for, waited for, or decontaminated survey instruments or air samplers.

The licensee hire an additional instrument repairman for a short period of time and this temporarily improved the availability of equipment.

No items of noncompliance were identified resulting from this problem.

8. Inspection of Ventilation Systems

The inspector measured the ventilation flow velocities on May 30, 1980, at chemistry hoods, doorways and passageways to determine compliance with an FSAR statement that ventilation flow is controlled to flow from less contaminated to more contaminated areas.

The licensee representative stated that consultants had been hired to recommend corrective measures for the various locations where the flow velocity was less than the design value or in the wrong direction.

The inspector observed on June 20, 1980, that the exhaust system ductwork between the filters and the blower suction, old radwaste building, was cracked open (crack dimensions 18 inches long x 1 inch wide). The licensee representative was notified on June 20.

The inspector observed on July 29, 1980, that the crack had not been corrected and the old radwaste building ventilation was one of the identified weak ventilation systems.

9. Operational Events

Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented and maintained that meet or exceed the requirements of Sections 5.1 and 5.3 of American National Standard N18.7-1972...."

American National Standard N18.7-1972, Section 5.1.4, "Special Order", states in part, "A mechanism shall be provided for issuing management instructions that have short term applicability and require dissemination. Such instructions, sometimes referred to as special orders should encompass special operations,...or other such matters...."

On June 5, 1980, licensee personnel were conducting an inspection of cable penetrations to gather information to develop a penetration surveillance procedure. Their inspection found a total of 5 penetrations between the cable spreading room and the control room, and one penetration between the "C" battery room and the 4160 volt room that did not have fire retardant seals. The shift supervisor was orally directed by the station superintendent to establish the fire watch patrols required by Technical Specification 3.12.E.2 which states "With a fire penetration barrier non-functional, within one hour establish a fire watch patrol to inspect both sides of the affected penetration at least once per every 2 hours." On June 6, 1980, the station superintendent notified the NRC Resident Inspector that his directions to establish the required fire watch had not been carried out until approximately 16 hours later. This constitutes an apparent failure to provide an adequate mechanism for the issuance of management instructions which resulted in a lack of adherence to technical specification requirements and is an apparent item of noncompliance (50-219/80-23-01).

10. Exit Interview

The inspectors met with the licensee representatives denoted (*) in paragraph 1, on July 29, 1980 (following the Station Manager's return from a short vacation). The inspection findings were reviewed.

The following items were reviewed:

Radwaste building ventilation problems;
Radwaste liquid processing problems;
Instrument upkeep; and,
Adherence to procedures and warning signs.

The licensee representative stated that he had no further questions on this inspection at this time.

ATTACHMENT 1

Status of Licensee Actions on Findings of Inspection Nos. 50-219/78-23 and 50-219/78-27; and NRC Enforcement Letter, J. G. Davis to S. Bartnoff, January 12, 1979, and JCP&L Reply Letter, S. Bartnoff to J. G. Davis, February 5, 1979.

<u>Designation in Notice of Violation or (*) in Enforcement LetterText</u>	<u>Initial Item Number (in Inspection Report)</u>	<u>Location of Details** Closing the Item in Report No. 50-219/80-14</u>	<u>Comments</u>
A	78-23-07	2/3	Continued compliance was observed, and documentation reviewed, June, 1980 (Inspection 50-219/80-23)
B	78-23-03	2/4	same comment
C	78-23-02	3/1	Worker compliance, training, and control point practices were observed June, 1980
D	78-23-04 78-23-05	3/2	Posting and barricading were observed daily, June 1980. No instances of non-compliance were identified.
E	78-23-01	---	Closed on Inspection No. 50-219/80-23, item 77-13-04 (78-23-01)
	78-27-01	---	77-13-04 (78-27-01)***
	78-27-06	---	77-13-04 (78-27-06)***
F	78-23-05	---	77-13-05 (78-23-05)***
G	78-23-06	3/3	Proper signs and procedure were verified again June, 1980

* Location (page/paragraph) of enforcement letter text.

** Location on (page no./sequence on page), Attachment 2 to Report No. 50-219/80-14).

*** See Section 2 of this report (50-219/80-23)

<u>Designation in Notice of Violation or (*) in Enforcement LetterText</u>	<u>Initial Item Number (in Inspection Report)</u>	<u>Location of Details** Closing the Item in Report No. 50-219/80-14</u>	<u>Comments</u>
H	78-23-10	---	Closed Inspection No. 50-219/79-20
I	78-23-09	---	Closed Inspection No. 50-219/79-20
*2/3	78-23-11 (Listed in error as 78-23-10 in report)	4/2	Procedures and further implementing corrective actions were reviewed on Inspection No. 50-219/80-23
*2/4	78-27-07	2/1	Status reviewed again during June, 1980
*2/5	78-23-08	2/2	Corrective actions reverified June, 1980