

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

REGION III

Report No. 50-341/80-21

Docket No. 50-341

License No. CPPR-87

Licensee: Detroit Edison Company
200 Second Avenue
Detroit, MI 48226

Facility Name: Enrico Fermi, Unit 2

Inspection At: Fermi Site, Monroe, Michigan

Inspection Conducted: November 19-21, 1980

Inspector: *W. L. Fisher*
L. J. Hueter

12/9/80

Approved By: *W. L. Fisher*
W. L. Fisher, Chief
Fuel Facility Projects and
Radiation Support Section

12/9/80

Inspection Summary

Inspection on November 19-21, 1980 (Report No. 50-341/80-21)

Areas Inspected: Routine, unannounced initial preoperational inspection of the radiation protection program, including: organization and staffing; training; radiation protection procedures; facilities; instruments and equipment; and respiratory protection program. The inspection involved 23 inspector-hours onsite by one NRC inspector.

Results: No items of noncompliance or deviations were identified in any of the six areas inspected.

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DETAILS

1. Persons Contacted

- **W. Holland, Manager, Nuclear Operations
- **E. Hines, Assistant Vice President - QA
- **W. White, Nuclear Operations Superintendent
- *H. Walker, Supervisor - Construction QA
- *E. Newton, Plant QA Engineer
- *E. Wilds, Acting Rad-Chem Engineer
- *P. Lavelly, Health Physicist
- *R. Eberhardt, Chemical Engineer
- *S. Pembleton, Personnel Assistant Training-Nuclear
- *R. Emmitt, Health Monitor
- **P. Byron, Resident NRC Inspector

*Denotes those present at the general exit meeting.

**Denotes those present at the upper management exit meeting.

2. General

This initial preoperational inspection of the radiation protection program began about 1:00 p.m. on November 19, 1980. It included a tour of the reactor control room, the turbine building, the radwaste building, the chemistry and counting laboratory, and the health physics office.

3. Organization and Staffing

The licensee currently is considering a change in the organizational structure and staffing of the Rad-Chem Section. Technical Specifications have not been issued as of the inspection date. Regarding minimum required qualifications, FSAR Section 13.1.2.1 states that Regulatory Guide 1.8 "Personnel Selection and Training" shall be met. Regulatory Guide 1.8 as reissued in May 1977 states that the criteria for selection and training of nuclear power plant personnel contained in ANSI N18.1-1971 "Selection and Training of Nuclear Power Plant Personnel" are generally acceptable, except for the position Supervisor-Radiation Protection often referred to as the Radiation Protection Manager (RPM). The guide then stipulates criteria for the RPM.

The Rad-Chem Section was found to have only skeletal staffing, in some cases even less now than at the time of the previous inspection nearly two years ago. The individual designated as the Rad-Chem Engineer in the FSAR has moved to a corporate position. His designated replacement has a Bachelor of Science degree in Aerospace Engineering from the U. S. Naval Academy, additional specialized training, and service as an administrative and engineering officer on nuclear submarines. He is currently receiving reactor operator training at Chattanooga, Tennessee. A Senior Engineer in the Rad-Chem Section (Acting Rad-Chem Engineer in the absence of the Rad-Chem Engineer),

who is responsible for radwaste, has a B.A. Degree in Engineering with a major in Chemical Engineering. In addition to military experience as a flight officer, this person had ten years experience with Dow Chemical Company and has been with the licensee two years (onsite). The Health Physicist and Chemical Engineer positions remain unchanged. A chemist position filled at the time of the January 11, 1979, inspection is now vacant. The individual formerly designated as Environmental Engineer has, at least for the time being, been assigned another job within the company, leaving the position vacant. Necessary tasks in that area are now being divided between the Chemical Engineer and the Health Physicist.

The individual filling one of the two Health Physics Supervisor positions during the January 11, 1979, inspection has since left the licensee, leaving both positions vacant. A single technician who assists both the Health Physicist and the Chemical Engineer has nuclear Navy experience and ELT training. The Chemist supervises three technicians at the Fermi I water treatment plant, one of whom had previous Rad-Chem Technician experience at the Fermi I plant. Of the people currently in the organization, it appears that only the Health Physicist qualifies for the FSAR-required position of Radiation Protection Manager and that only the Chemical Engineer qualifies for the FSAR required position involving radiochemistry.

No items of noncompliance or deviations were identified.

4. Initial Training and Refresher Training

The inspector met with people in the Training Section responsible for developing training programs at the plant. Of particular interest were the general employee training and retraining in radiation protection, and the specialized training and retraining for technicians in radiation protection, chemistry, and radwaste. The training people have been gathering training material from other licensees. First priority is being given to general employee training (goal to implement in January 1981) to provide for unescorted access to the plant. This training is to cover material in 10 CFR 19 and 20, prenatal exposure of females, protective clothing, and Radiation Work Permit (RWP) usage. Additional training is planned to be group specific and tailored more to specific needs. It was indicated that progress on specialized training for technicians in radiation protection, chemistry, and radwaste, as well as all retraining programs, is only minimal. Training personnel stated that the general employee training program, to be implemented early in 1981, was not yet in a form suitable for presentation and review by the inspector.

No items of noncompliance or deviation were identified.

5. Radiation Protection and Chemistry Procedures

Radiation protection and chemistry procedures are an estimated 50-65 percent complete. Those already written are being recodified. Procedures were not reviewed during this inspection.

No items of noncompliance or deviations were identified.

6. Facilities

Decontamination areas, "change" rooms, counting rooms, and laboratory rooms are not set up and equipped.

No items of noncompliance or deviations were identified.

7. Instruments and Equipment

Only a limited amount of equipment for radiation protection and chemistry is on hand, much of it still in the original packaging. This appears due, partly to facilities not being ready for occupancy and partly to the limited staffing mentioned previously. Equipment on hand and being set up includes: a respirator fit test booth with additional equipment for testing respirators for leakage, following repair, and for testing filters for breathing resistance (differential pressure across the filter) before reuse; a TLD reader system with computer memory for storage of dose information; and equipment for trace analytical work in chemistry.

No items of noncompliance or deviations were identified.

8. Respiratory Equipment

The respirator fit test booth was on hand as noted in the previous paragraph. Some other equipment was not available, nor was the program developed enough to permit inspection at this time.

No items of noncompliance or deviations were identified.

9. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on November 21, 1980.

The following matters were discussed:

- a. The purpose and scope of the inspection.
- b. The inspector expressed concern regarding the current lack of staffing in the Rad-Chem Section, considering: the work and training to be accomplished before bringing fuel onsite; the time previously required to get job offers out; and the probable difficulty in hiring ANSI qualified individuals for the many

positions to be filled. (The Licensee has indicated an intent to fill most positions, including technician positions, with ANSI qualified individuals.) The licensee stated that they have recently considered Rad-Chem Section staffing a priority item and that getting jobs approved and job offers out can be expedited. The licensee indicated that, if need be, jobs could be filled with contracted people but that this would not be their preference. The inspector noted that current proposed revisions to guides and standards indicate more stringent ANSI qualification criteria (Paragraph 3).

The inspector also expressed concern over the potential loss of program continuity that could develop with the lack of backup people in the current staffing situation. The licensee acknowledged the concern.

- c. The inspector also expressed concern regarding the status of the training program as related to radiation protection and chemistry, noting that much remains to be done even regarding general employee training, which is to be implemented in early 1981. The inspector cautioned against delaying training until the "last minute," due to the heavy workload that will be encountered as later milestones are approached. The licensee acknowledged the concern (Paragraph 4).