



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

TIC

Docket No. 50-272
EA 80-13

FEB 18 1981

Public Service Electric and Gas Company
ATTN: R. M. Eckert
Senior Vice President
Energy Supply and Engineering
80 Park Plaza
Newark, New Jersey 07101



Gentlemen:

Subject: Inspection No. 50-272/80-28

An inspection conducted during the period October 7-9 and 14-17, 1980 at the Salem Unit 1 Nuclear Generating Station to examine the circumstances surrounding an October 4, 1980 personnel contamination event and an October 10, 1980 personnel exposure event, revealed that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license.

The inspection findings indicate that supervisory personnel directed the performance of activities without sufficient consideration of the radiological hazards associated with the activities. We are particularly concerned with your workers entering radiologically hazardous areas that had not been previously surveyed.

The items of noncompliance listed in Appendix A have been grouped according to event. The first group of items is associated with the event of October 4, 1980 during which two of your employees entered a highly contaminated reactor fuel transfer tube. The second group of items is associated with the October 10, 1980 event during which three of your employees entered unexpectedly high radiation fields during an inspection of a pump under the reactor vessel.

Our review of the first event indicates that the workers made the entry into an area that was not described on their radiation exposure permit or identified to your radiation protection staff as an area to be entered. This entry was made with the knowledge of their supervisor. As a result, your radiation protection staff was unaware of the personnel entry and, therefore, did not provide the necessary radiological controls usually prescribed for entries into highly contaminated environments. Upon exit from the tube the personnel were found to be extensively contaminated and had sustained intakes of radioactive material.

Regarding the October 10, 1980 event, you were advised of the necessity to effectively control access, to identify the nature of the hazard, and to perform adequate pre-entry surveys of such areas by Inspection and Enforcement Circular No. 76-03 dated September 13, 1976. In response the Public Service Electric and Gas Company stated that personnel entry into such areas is made

8103040181

only after review and approval by the Radiation Protection Foreman and the Shift Supervisor. This review, per your response, is to be accomplished through your radiation exposure permit system and is to ensure that conditions within the area are known by the individuals entering and authorizing entry.

The fact that the event occurred shows that your radiation exposure permit system was ineffective in this case. Our review of this event shows that it occurred principally because neither of the two Radiation Protection Foremen who approved the entry were aware of the flux thimble withdrawal and the resultant high radiation levels in the reactor cavity. Further, a Maintenance Supervisor, one of the individuals who made the entry, was aware that the flux thimbles were retracted. He had in fact been involved in their retraction; however, he failed to recognize the radiological significance of this act. The Shift Supervisor who directed the entry failed to assure that steps necessary to counteract the hazardous radiation levels due to the retracted thimbles were taken. Our concern about the event is heightened by the fact that a pre-entry planning meeting was ineffective. This meeting was attended by the individuals making the entry, the Shift Supervisor, and the two Radiation Protection Foremen, but there still was no consideration given to the radiological hazards associated with withdrawal of the flux thimbles.

In both events, the Senior Shift Supervisors failed to take actions necessary to assure that the tasks could be performed without inadvertent or unnecessary radiation exposure of the plant workers. The responsibility of NRC Licensed Operators for the safety of plant workers was identified in IE Information Notice 79-20 and the subsequent revision thereto. Our review indicates an apparent lack of management direction to operating personnel to implement the NRC policy set forth in the Information Notice.

As stated to you in our letter dated October 24, 1980, we understand that immediate corrective actions which you have instituted or plan to institute to prevent additional events of the type described in the enclosed Appendix A include 1) instruction of all site supervisory personnel in the requirement to take all necessary action to prevent inadvertent or unnecessary radiation exposure; 2) revision of your radiation exposure permit, radiation survey and flux thimble maintenance procedures; and 3) the establishment of a training program for plant supervisory personnel. In your response to this letter, please describe additional changes to station procedures to define the responsibilities of the Senior Shift Supervisor for assuring personnel safety and to improve the transfer of information about plant status at shift turn over. In addition, your response should also address your method for providing your shift supervisory personnel with copies of procedures they are required to implement, such as that for authorizing proposed work covered by your radiation exposure permit system.

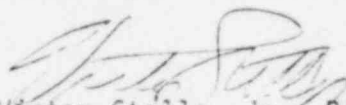
In light of the seriousness of these events, we propose civil penalties in the amount of Ninety-Thousand Dollars for the items of noncompliance described in Appendix A. The Interim Enforcement Policy, 45 FR 66754, October 7, 1980, permits increasing the basic civil penalty for situations wherein the licensee had prior knowledge of a problem such as by the issuance of an Inspection and

Enforcement Circular. We have, therefore, increased the civil penalty by 25 percent for the October 10, 1980 event. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

Your written reply to the Notice of Violation combined with the findings from our continuing inspections of your licensed activities will be considered in determining whether further enforcement action, such as modification, suspension or revocation of your license, is appropriate.

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 will be placed in the NRC's Public Document Room.

Sincerely,


Victor Stello, Jr., Director
Office of Inspection and Enforcement

Enclosure:
Appendix A, Notice of Violation
and Proposed Imposition of a
Civil Penalty

cc w/encl:
F. W. Schneider, Vice President-Production
J. Boettger, General Manager - Quality Assurance
R. L. Mittl, General Manager - Licensing and Environment
H. J. Midura, Manager - Salem Generating Station
R. A. Uderitz, General Manager - Nuclear Production