

AFL-CIO

LOCAL 346

CHEBOYGAN

MICHIGAN



March 17, 1975

Mr. James G. Keppler, Regional Director
 U.S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, Illinois 60137

Dear Mr. Keppler;

As President of Local 346 U.W.U.A., embracing operating and maintenance personnel at Big Rock Point in Charlevoix, Michigan; I wish to call to your attention an occurrence which we feel was a violation of procedures E2.1.3.8 and 10 CFR 50 Appendix B. This alleged violation subjected two (2) of our members to a potentially hazardous situation.

During our present outage four (4) in-cores were to be replaced. Procedure MRVI-1 Rev. 2, was issued and approved directing maintenance personnel to install and operate a tool from the rod drive room to push up the in-cores for subsequent removal by the operators from over the reactor. During this phase of the procedure radiation protection was to be notified to survey and monitor the activity. Plant procedure E 2.1.3.8, states that a data sheet is to be made out before starting any work in a high radiation area. The data sheet should contain the following; film badge number, quarterly exposure to date, permissible exposure, radiation field and stay time.

During the afternoon of January 22, 1975, maintenance men entered the area to install the tool and push up the in-cores. Radiation protection required fresh air hoods for the men since the air activity was greater than 33 MPC and past experience had shown that crud with radiation levels exceeding 2 R/Hr., could fall on the men from the penetration above. The maintenance men only had time to install the tools but didn't push the in-cores up. Shortly after 0700 the following morning the shift supervisor ordered two (2) operators to enter the

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AFL-CIO

LOCAL 346

CHEBOYGAN



MICHIGAN

Page 2

rod drive room to push up the in-cores. Since the operators do not customarily do this work they were unaware of the potential hazards. The procedure was not reviewed with the operators, radiation protection was not notified, no air samples were taken and the data sheet for work in a high radiation area was not completed prior to the work being done. Again because of unfamiliarity the operators wore only anti "C" clothing without respiratory protection and completed the job in less than a half hour without any mishaps.

The awareness of the hazards has only come about through my investigation of the grievance generated by the assignment of the operators to do this work.

Even though the Company may disagree with the Union about the assignment with respect to our contract, our position remains "that if the procedures were followed as written and the men with prior experience used would have promoted a safer working condition."

We trust that the requirements for Q.A. procedures is directed at promoting safety as well as documentation. It is hoped that through a united effort these goals can be achieved.

Sincerely yours,

Charles Sonnenberg
 Charles Sonnenberg, President
 Local 346 U.W.U.A.
 RD # 3
 Charlevoix, Michigan 49720