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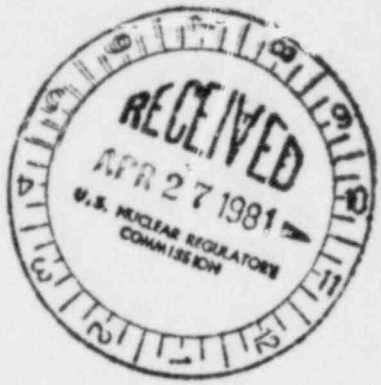
UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

MAR [illegible] 1981



Docket No. 50-409

Dairyland Power Co operative
ATTN: Mr. F. W. Linder
General Manager
2615 East Avenue - South
La Crosse, WI 54601

Gentlemen:

The NRC has identified a need for licensees to strengthen the health physics programs at nuclear power plants and has undertaken a significant effort to ensure that action is taken in this regard. As a first step in this effort, the Office of Inspection and Enforcement is conducting special team appraisals of the health physics programs, including the health physics aspects of radioactive waste management and onsite emergency preparedness, at all operating power reactor sites. The objectives of these appraisals are to evaluate the overall adequacy and effectiveness of the health physics program at each site and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements but also to improve NRC requirements and guidance. This effort was identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement.

During the period September 22 to October 3, 1980, the NRC conducted the special appraisal of the health physics program at the LaCrosse Boiling Water Reactor. Areas examined during this appraisal are described in the enclosed report (50-409/80-10). Within these areas, the appraisal team reviewed selected procedures and representative records, observed work practices, interviewed personnel, and performed independent measurements. We request that you carefully review the findings of this report for consideration in improving your health physics program.

Findings of this appraisal indicate that significant weaknesses exist in several areas of your health physics program. These include, organization and managment, training, procedures, exposure control, instrumentation and ALARA. These items are set forth in Appendix A, "Significant Appraisal Findings." Your past performance in personal exposure and radiological

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effluent controls has been acceptable but we believe that the identified weaknesses require correction to enable you to perform equally well in future normal and offnormal situations. Your present health physics program is considered adequate to support continued operation while achieving acceptable corrective action for the identified weaknesses.

We recognize that an explicit regulatory requirement pertaining to each significant weakness identified in Appendix A may not currently exist. However, to determine whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty-five (25) days of the date of this letter, describing your corrective action for each significant weakness identified in Appendix A, including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

During this appraisal, it was also found that certain of your activities do not appear to have been conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed as Appendix B. A written response is required.

You should be aware that the next step in the NRC effort to strengthen health physics programs at nuclear power plants will be a requirement by the Office of Nuclear Reactor Regulation (NRR) that each licensee develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for significant weaknesses identified during the special appraisal of the current health physics program. Guidance for the development of this plan will incorporate pertinent findings from all special appraisals and will be issued for public comment early in 1981.

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, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty-five days of the date of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

A Bert Davis

for James G. Keppler
Director

Enclosures:
1. Appendix A, Significant Appraisal Findings
2. Appendix B, Notice of Violation
3. IE Inspection Report No. 50-409/80-10

cc w/encls:
R. E. Shimshak, Plant Superintendent
Central Files
Reproduction Unit NRC 20b
AEOD
Resident Inspector, RIII
PDR
Local PDR
NSIC
TIC
John J. Duffy, Chief Boiler Inspector
Mr. Stanley York, Chairman Public Service Commission

Appendix A

Significant Appraisal Findings

Dairyland Power Cooperative Docket No. 50-409

Based on the Health Physics Appraisal conducted September 22 to October 3, 1980, the following items appear to require corrective action. (Section references are to the Details portion of the enclosed report.)

1. Organizational and managerial improvements are needed to resolve problems regarding health physics technical expertise, supervisory personnel workload, staffing, technician performance, and radiation protection program enforcement. (Sections 3.a, 3.b, 3.c, and 3.d)

2. The health physics technician training program requires improvement in terms of documented initial and refresher training requirements, and conduct of emergency sampling and analysis training. (Sections 4.a and 13)

3. Procedural coverage and adherence need upgrading to include activities not presently addressed and to resolve inconsistencies between procedures and actual practices. (Sections 6, 8.a, 8.c, 9.b, 11.a, and 11.c)

4. The internal and external exposure control programs need upgrading to incorporate formalized TLD spiking, TLD/pocket dosimeter intercomparisons, and whole body counter calibrations and to ensure the availability of a sufficient supply of respiratory protective devices for accident response. (Sections 7.a and 7.b)

5. The radiation survey program needs upgrading in terms of scope and frequency of direct radiation surveys, contamination survey coverage, and task oriented surveys. (Sections 8.a and 8.c)

6. The instrumentation program needs improvement to include calibration acceptance criteria and to resolve problems regarding high range (accident) noble gas monitoring, personal contamination detection, and continuous air monitor calibrations. (Sections 9.b, 9.c, 9.d, 9.e and 11.a)

7. A formalized ALARA program needs to be developed. (Section 10)