PACIFIC GAS AND ELECTRIC COMPANY

PG&E — 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211

FREDERICK T. SEARLS
VICE PRESIDENT AND GENERAL COUNSEL
JOHN C. MORRISSEY
ASSOCIATE GENERAL COUNSEL
WILLIAM B. KUDER
WILLIAM E. JOHNS
MALCOLM H. FURBUSH
CHARLES T. VAN DEUSEN
MALCOLM A. MACKILLOP
PHILIP A. CRANE, JR.
ASSISTANT GENERAL COUNSEL

NOEL KELLY
HENRY J. LAPLANTE
RICHARD A. CLARKE
GILBERT L. HARRICK
EDWARD J. McGANNEY
JOHN B. GIBSON
GLENN WEST, JR.
ARTHUR L. HILLMAN, JR.
CHARLTS W. THISSELL
ROBERT OHLBACH
DANIEL E. GIBSON
SENIOR COUNSEL

DAN GRAYSON LUBBOCK
JOSEPH I. KELLY
BERNARD J. DELLASANTA
JACK F. FALLIN, JR.
HOWARD V. GOLUB
DONALD L. FREITAS
JAMES C. LOBBOON
JOSEPH S. ENGLERT, JR.
LOUIS F. SCHOFIELD
ROBERT L. GORDON
DENNIS C. SULLIVAN
KATHY GRAHAM
ROBERT L. HARRIS
LINDA S. FRIEDMAN
J. PETER BAUMGARTNER
ROBERT N. SCHIFF
RICHARD L. MEIS
IVOR E. SAMSON
ATTORNEYS

January 2, 1975

Mr. R. H. Engelken, Director
Directorate of Regulatory Operations
Region V
U. S. Atomic Energy Commission
1990 N. California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, California 94596

Re: Docket No. 50-133
License No. DPR-7

Dear Mr. Engelken:

This is in reply to your letter dated December 12, 1974 concerning the inspection of November 11-14, 1974 made at our Humboldt Bay Power Plant by Region V Directorate of Regulatory Operations Personnel. Your letter discussed two of our activities which appeared to your inspectors to be in noncompliance with AEC requirements.

Item 1 of Appendix A of your letter states:

> "10CFR20.201(b), Surveys, requires the performance of surveys to assure compliance with the requirements of 10CFR20. No surveys were performed to evaluate the possible release of radioactive materials to unrestricted areas required by 10CFR20.106(a) Radioactivity in effluents to unrestricted areas, following the discovery of smearable radioactive material on the roof of the turbine enclosure."

Following the discovery of smearable radioactivity on the roof of the turbine enclosure, the area was barricaded and posted to prevent the spread of contamination. The source of contamination was determined to be increased steam leakage inside of the turbine enclosure. Previous evaluations have shown that releases through these ventilators have been negligible compared to technical specification limits. Therefore, no special environmental surveys were initiated. However, offsite dose rates due to noble gas releases are continuously monitored by a network of 36 stations which are evaluated at least once every two weeks. No significant increase was seen at these stations during

the period of increased leakage. Also, environmental samples are collected and analyzed quarterly to determine whether significant halogen and particulate releases have occurred. No iodine was detected in the routine milk samples collected during the period of increased leakage. Following the compliance inspection, an analytical evaluation was performed which showed that the annual halogen and particulate release limit was not exceeded.

Corrective action will consist of a revision of plant procedures requiring a prompt evaluation of the potential for release of radioactive materials to unrestricted areas whenever the turbine enclosure I-131 airborne radioactivity concentration exceeds 1 MPC for a 168-hour week (10 micro Ci/cc). In addition to the above procedural control, modifications to the plant ventilation system that will eliminate discharges through the turbine enclosure are presently being evaluated.

The required procedural revisions will be completed, approved and placed in service no later than February 1, 1975. The modifications to the plant ventilation system which require detailed engineering and procurement of materials are scheduled to be completed in the spring of 1976 to coincide with the completion of the off-gas system modification.

Item 2 of Appendix A to your letter states:

> "10CFR20.203(c)(2), Caution signs, labels and signals, requires that each access point to a high radiation area shall be maintained locked or equipped with an audible or visible control signal such that individuals entering and the licensee or a supervisor are made aware of the entry to a high radiation area.
>
> "It was observed during a plant tour that at shift change time, when the -66 foot level of the access shaft was unoccupied, the normally locked gate was open and the gate interlock alarm device had been defeated. This area is a high radiation area."

The access to the high radiation area at the -66 foot elevation of the access shaft is normally controlled by means of an alarm interlocked gate. The alarm interlock provides both local and control room alarms when the gate is opened. On the date that the inspection of the -66 foot elevation was made, several groups of maintenance personnel had been working in the high radiation area under a Special Work Permit (SWP). The gate interlock had been deactivated to avoid having the local and control room alarms annunciate continuously when it was necessary to leave the gate open. This practice is used during maintenance work when a high radiation area is continuously occupied and work is being performed under a SWP.

Due to an oversight, the interlock was not returned to normal when the maintenance personnel left the area. Following the occurrence

the proper procedures were discussed with plant personnel. In addition, for the remainder of the outage all SWP's issued for work in a high radiation area carried an entry under Special Instructions - "Do not deactivate the gate alarm without approval of the Radiation Process Monitor." Prior to the next refueling outage, equivalent instructions will be incorporated into the Plant Radiation Control Procedures.

Very truly yours,

Philip A. Crane, Jr.