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Jersey Central Power & Light Company

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General General Comparent System General General Comparent Public Utilities Corporation

November 8, 1976

Mr. James P. O'Reilly, Director Office of Inspection and Enforcement Region I United States Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

Dear Mr. O'Reilly:

Subject: Oyster Creek Nuclear Generating Station Docket No. 50-219 IE Circular 76-03

The purpose of this letter is to respond to IE Circular 76-03 which is concerned with overexposures caused by failure to appropriately control entry into high radiation areas, failure to conduct adequate surveys and failure to compensate for exposure rate variations that can occur in various areas in power reactors. The following actions have been taken to comply with the directives set forth in Items 1 through 4 under the heading "Actions to be Taken by Licensees."

Item 1 - A thorough review of all plant areas and operations has been conducted to identify the high radiation areas as defined in 10 CFR 20.202(b). Both continuous and transient high radiation areas have been identified.

Item 2 - During the review of the areas and operations identified in Item 1, the postings and barricades were also verified. Those high radiation areas in which radiation levels exist in excess of 1000 mr/hr were verified to be securely locked and conspicuously and appropriately posted.

Item 3 - Radiation protection procedures were reviewed to insure that they adequately address the matter of control and access to the high radiation areas. Specifically, procedures exist for:

- (a) Identification and Posting Controlled Areas
- (b) Access and Egress Control
- (c) Radioactive Work Permits (RWP)
- (d) Radiation Survey
- (e) Contamination Survey
- (f) Air Sampling

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Mr. O'Reilly

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All persons granted access to a high radiation area are cautioned to be alert to any changing conditions which might alter the stated RWP requirements and to immediately notify radiation protection personnel for corrective action.

It has been concluded that the existing training program adequately covers the matter of control of and access to high radiation areas. A retraining program for all personnel will be scheduled and completed by November 30, 1976.

Item 4 - Personnel entry into actual or potential high radiation areas is governed through the use of the RWP. All RWP's are reviewed by the Group Shift Supervisor prior to the commencement of any work. His signature denotes his awareness that the job will take place and that he is aware of the impact the job has on all other systems in the plant. Through this review, he is aware of the possibility of any changing conditions. The Group Radiation Supervisor is required to review all RWP's written for jobs which may require individuals in the work party to receive exposures in excess of 150 mrem

The primary management review and control is manifest in the form of the approvals required for the work party to receive exposure increments above certain amounts specified by the RWP. Should these authorized levels of exposure be approached, further review of the job is undertaken.

Documents supporting all findings, the actions taken and the actions to be taken are available at the Oyster Creek Station for review by the NRC.

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Donald A. Ross, Manager Generating Stations-Nuclear

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cc: United States Nuclear Regulatory Commission Office of Inspection and Enforcement Division of Reactor Inspection Programs Washington, DC 20555

