

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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November 3, 1980

Docket No. 50-245  
50-336  
A01176

Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Nuclear Regulatory Commission Inspection  
50-245/80-13 and 50-336/80-14

Gentlemen:

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, this report is submitted in reply to your letter of October 8, 1980, which informed the Northeast Nuclear Energy Company of apparent infractions of the NRC Facility Licenses DPR-21 and DPR-65.

## Item A

10 CFR 20.103 (a)(3) states in part, "For purposes of determining compliance with the requirements of this section, the licensee shall use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas..."

Contrary to the above, on August 13, 1980, surveys representative of the air breathed by workers were not collected and analyzed prior to starting or during work in the Torus bay, an area with loose surface contamination of levels to 180,000 dpm per 100 sq. cm. beta-gamma. Three individuals became internally contaminated during performance of their work, which required crawling in the torus bay area.

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Response A

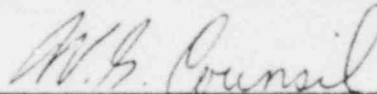
The requirements for work in the torus area were changed to specify respiratory protection and air sampling requirements during work in this area. Evaluations of the procedural requirements for air sampling in all areas were conducted. The results of these evaluations indicated that implementation of specific air sampling requirements in areas with high surface (radioactive) contamination levels was necessary.

Change 1 was issued to Procedure HP 915/2915, Revision 13 on August 22, 1980. Paragraph 5.4.3.8 now requires that, "Air samples shall be conducted prior to issuance of an RWP for any areas contaminated in excess of 100,000 dpm per 100 sq. cm. Additional representative breathing zone air samples should be obtained at the commencement of any physical work being performed within the area. Extended work or changing conditions require evaluation for additional sampling requirements".

No internal exposure limits were exceeded as the result of the internal contamination of these individuals.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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W.G. Counsil  
Senior Vice President