

APPENDIX A

NOTICE OF VIOLATION

Northeast Nuclear Energy Company

Docket No. 50-245

Based on the results of an NRC inspection conducted on August 3 - September 6, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC License as indicated below. These items are categorized as infractions.

- 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.

- B. Technical Specification 6.11, Radiation Protection Program, states in part, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 . . ."

10 CFR 20.103 (a)(1) states in part, "No licensee shall possess, use, or transfer licensed material in such a manner as to permit any individual in a restricted area to inhale a quantity of radioactive material in any period of one calendar quarter greater than the quantity which would result from inhalation for 40 hours per week for 13 weeks at uniform concentrations of radioactive material in air specified in Appendix B, Table I, Column I . . ."

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, as of August 21, 1980, Station Health Physics procedures did not mandate that airborne surveys be conducted consistent with the requirements of 10 CFR Part 20. Standardized Health Physics procedure HP 4905, Radiological Surveys, Revision 1, dated August 11, 1980, paragraph 8.5 allowed optional compliance with these requirements. Unit Health Physics procedure HP 915/2915, Health Physics Surveys, Revision 13, July 1, 1980, did not require surveys to fully implement 10 CFR 20.103(a)(1) and 20.103(a)(3).

The inspector reviewed the licensee's corrective action. Change 1 to HP 915/2915, Revision 13 was issued on August 22, 1980. No additional response is required concerning this item.

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