

April 13, 1981

Docket Nos. 50-245 50-336 A01596

Mr. Boyce H. Grier Director, Region 1 Office of Inspection and Enforcement U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

Reference: (1) Nuclear Regulatory Commission Inspection 50-245/80-12 and 50-336/80-11.

Gentlemen:

Millstone Nuclear Power Station; Unit Nos. 1 and 2 Health Physics Appraisal

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 Appendix B of Reference (1), which informed the Northeast Nuclear Energy Company of one apparent item of non-compliance.

Item

10 CFR 20.201(b) "Surveys" require that such surveys be conducted as may be necessary to comply with the regulations contained in each section of Part 20. A "Survey", as defined in paragraph 20.201(a), means "An evaluation of the radiation hazards incident to production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and meausrements of levels of radiation of concentrations of radioactive materials present". Survey requirements are further amplified in your Procedure HP 1905, "Radiological Surveys", Revision 1, and A. G. Cheatham's memo to Health Physics Personnel, dated April 10, 1979.

Contrary to the above, on August 21, 1980, three workers were allowed to install insulation in the Unit 1 Shut Down Pump Room (RWP 802934) without airborne surveys performed prior to or during work activities to establish airborne concentrations in order to demonstrate compliance with 10 CFR 20.103. Contamination surveys conducted in the pump room on August 19, 1980, indicated loose surface contamination levels greater than 500, 0 dpm/100 cm beta-gamma. This is an infraction.

Corrective actions have been taken as noted in Inpsection Reports 50-245/80-13 and 50-336/80-14 and are as follows:

- On August 22, 1980, a change was issued to procedure HP 915/2915 which required air samples to be taken prior to and during any work performed in areas with loose surface contamination exceeding 100,000 dpm/100cm.
- Health Physics Technicians were made aware of this change and the incidents which precipitated the change.
- 3. Subsequent to this inspection, comprehensive re-training of Health Physics personnel in air sampling was completed. Also, a strengthening of the radiation Work Permit Program and radiation survey programs has been implemented through significant changes to procedures SHP 2905 and SHP 4912.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil

Senior Vice President