



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II

101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-321/81-10 and 50-366/81-10

Licensee: Georgia Power Company
270 Peachtree Street
Atlanta, GA 30303

Facility Name: E. I. Hatch

Docket Nos. 50-321 and 50-366

License Nos. DPR-57 and NPF-5

Inspection at Hatch Site near Baxley, Georgia

Inspectors: John R. Wray 5/8/81
J. R. Wray Date Signed

L. A. Franklin 5-11-81
L. A. Franklin Date Signed

Approved by: C. M. Hosey 5/13/81
C. M. Hosey, Acting Section Chief Date Signed
Technical Inspection Branch
Engineering and Technical Inspection Division

SUMMARY

Inspected on April 13-17, 1981

Areas Inspected

This routine, unannounced inspection involved 69 inspector-hours onsite in the areas of organization and qualifications, exposure controls, respiratory protection, posting and control, contamination controls, surveys and instrumentation, and radwaste shipping.

Results

Of the seven areas inspected, no violations or deviations were identified in five areas; one violation was found in each of two areas (failure to post radiation areas - paragraph 8, and failure to follow procedures - paragraphs 8 and 10).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

M. Manry, Plant Manager
*C. T. Moore, Assistant Plant Manager
*T. V. Greene, Assistant Plant Manager
*W. M. Rogers, Supervisor - Chemistry and Health Physics
*H. W. Dyer, Supervisor - Operations
*D. F. Moore, Supervisor - Nuclear Training
C. R. Miles, Quality Assurance Field Supervisor
C. E. Belflower, Quality Assurance Site Supervisor
*D. Smith, Laboratory Supervisor (Health Physics)
*R. C. Hand, Laboratory Supervisor (Chemistry)
*I. Kochery, Junior Health Physicist
*M. Link, Laboratory Foreman
M. Squires, Laboratory Foreman
*T. Sheppard, Junior Engineer
*R. Tracy, Junior Engineer
*R. K. Godby, Junior Engineer
*P. E. Fornel, Senior QA Field Representative
*W. B. Thigpen, Senior QA Field Representative
*W. P. Wagner, QA Field Representative

Other Organizations

J. R. Coleman, GE - Lead Technician
J. Scott, ARC - Contract HP Supervisor
W. Rehwalt, Rad Services - Site Coordinator

NRC Resident Inspector

R. F. Rogers

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on April 16, 1981 with those persons indicated in paragraph 1 above. The Assistant Plant Managers acknowledged the procedural violations but stated that posting the entrance to the reactor buildings and the radwaste buildings as a radiation area has in the past been considered sufficient for complying with the requirements of 10 CFR 20.203. The inspector emphasized that each radiation and high radiation area must be properly posted within buildings or rooms most of which may not be a radiation or high radiation area. On April 17, 1981, additional discussions were held between the inspectors and Mr. Greene and Mr. Smith regarding the new open item discussed in paragraph 11.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Organization and Personnel Qualifications

An inspector reviewed the health physics organization and staffing as it pertained to the current Unit 1 refueling outage. During the inspection, there were 13 licensee health physics technicians and between 100 and 105 contract health physics technicians from three different companies. The licensee technicians were placed in specialty areas, such as dosimetry, instrument calibration, respiratory protection, or radwaste shipping, and reported to one of three licensee foremen during days and one foreman each for the evening and night shifts. The contract HP technicians provided health physics job coverage for activities on the refueling floor, in the drywell, in the torus, and at control points throughout the plant. These technicians reported administratively to their company health physics site coordinator who reported directly to the licensee's health physics supervisor. If a technical issue arises, the contract technicians report to the licensee health physics foreman responsible for activity in the unit where the concern arose. The inspector concluded from discussions with licensee representatives, observation of job activities, and review of records that adequate health physics coverage was being provided.

The inspector discussed with licensee representatives the implementation of advanced planning and preparation for this outage. It was noted that the outage organization requires a health physics representative at daily status and preplanning meetings. The HP staff appeared to be cognizant of plant activities and able to provide adequate resources in a timely manner.

Technical Specification 6.3.1 states that technicians in responsible positions shall meet or exceed the minimum qualifications of ANSI N13.1-1971. The inspector selectively reviewed resumes of health physics personnel to determine if technicians in responsible positions satisfy the requirements of the ANSI standard. Both contract and licensee health physics technicians in positions of responsibility appear to meet the requirements. A licensee representative stated that contract resume information is selectively verified by cross checking NRC Form 4 information and contacting other NRC licensees when appropriate. The inspector had no further questions or comments on the licensee's health physics organization nor the qualifications of health physics personnel in responsible positions.

6. Exposure Controls

An inspector selectively reviewed records of personnel exposures. Data indicated that no worker was exposed to levels of radiation in excess of the applicable regulatory limits in 10 CFR 20.101. The inspector noted that extremity dosimeters were issued when appropriate. External personnel exposure information, indicating remaining exposure which could be received before an administrative limit is reached, was posted on the bulletin board in the HP office. An inspector selectively reviewed whole body counts taken during the outage. Data indicated that no worker was internally exposed to levels of radioactivity in excess of the regulatory limits in 10 CFR 20.103.

7. Respiratory Protection

The inspectors evaluated the licensee's respiratory protection program as it pertained to air sampling, use of engineering controls, and incorporation of the requirements of 10 CFR 20.103 and recommendations of Regulatory Guide 8.15 and NUREG 0041.

The air sampling program is controlled in part by plant procedures HNP-8005, "Radiation and Contamination Control" and HNP-8013, "Airborne Radioactivity Concentration Determination". Both routine and special air samples are taken. The inspector noted that over 4000 air samples had been taken in support of the Unit 1 outage at the time of the inspection. Review of the air sample log showed 15 air samples were taken in the torus chamber and proper on April 10, 1981, to support the torus modifications. Eleven of these were high volume samples representative of a worker's breathing zone. The efficiency and background on the air sample counting instrument are checked nightly. The inspector had no further questions or comments concerning the licensee's air sampling program for the refueling outage.

The inspector noted that two 12,000 cf_m HEPA filter units, modified by plant engineers, continuously filtered air from the torus. These units control general area airborne radioactivity to below significant levels. However, due to the nature of their jobs, each worker entering the torus proper wears a respirator. The HEPA filter units do not have differential pressure gauges, nor temperature or humidity indicators. A licensee representative stated that until these instruments are obtained and installed, the filters are replaced every two days to ensure they do not become overloaded. The filters are handled as radwaste but the licensee did not have a written procedure to perform HEPA filter removal. The inspector stated that the procedure for filter removal should be formalized (50-321/81-10-01; 50-366/81-10-01). The inspector also commented that such frequent filter replacement generates increased radwaste (see paragraph 9 on radwaste storage). The installation of differential pressure instrumentation will reduce the number of HEPA filter replacements which will in turn reduce the generation of solid radwaste.

Procedure HNP-8010 provides instructions for the selection, use, maintenance, control and storage of respiratory equipment. An inspector stated that although it appeared the requirements of 10 CFR 20.103 are being met, personal observations and discussions with licensee representatives disclosed certain activities in disagreement with two recommendations of NUREG 0041, "Manual of Respiratory Protection Against Airborne Radioactive Materials." Storage of respirators during non-outage periods does not appear to conform with Section 9.3 in that respirators are stored in 55-gallon drums. The program for inspection of respirators does not appear to comply with the recommendations of Section 9.2 in that monthly checks are made only on the SCBA respirators. The inspector reviewed the survey, repair, and issuance programs for respirators and had no comments. However, the inspector stated that the recommendations in Section 9.2 and 9.3 concerning storage and inspection of respirators should be incorporated into the plant's respiratory protection procedure (50-321/81-10-02; 50-306/81-10-02).

8. Posting and Control

On April 13, 1981, the inspectors accompanied by licensee representatives, toured the facility and identified two areas meeting the definition of radiation area in 10 CFR 20.202(b)(2) which were not properly posted as required by 10 CFR 20.202(b). Readings of between 5 mr/hr and 10 mr/hr were obtained in the general area around the south scram discharge header bank in the Unit 2 reactor building. A reading of 50 mr/hr was obtained at knee level above the edge of a manway opening to the sump in the Unit 1 radwaste building. Inside the opening, readings up to 600 mr/hr were observed. Radiation levels in the general area of the gonads and the chest were greater than 5 mr/hr. All readings were obtained using a licensee calibrated portable survey instrument. A licensee representative stated that the entrances to the reactor buildings and radwaste buildings were posted as Radiation Areas. The inspector stated that each radiation and high radiation area within buildings or rooms, most of which may not be a radiation or high radiation area, must be posted in accordance with 10 CFR 20.203. General area readings in both buildings were less than 2 mr/hr. Failure to post the south scram discharge header bank in the Unit 2 reactor building and the manway opening to the sump in the Unit 1 radwaste building as radiation areas is a violation of 10 CFR 20.203(b)(2) (50-321/81-10-03; 50-366/81-10-03).

Over 50 drums of radwaste packaged for shipment to burial sites were stored temporarily near the drum capping room in the Unit 2 radwaste building. The inspector observed readings up to 750 mr/hr on contact with the lid of one drum accessible to passersby. Eighteen inches from the surface of the drum, the dose rate levels decreased below 100 mr/hr. The area was properly posted as a radiation area. However, since the drums were packaged for transport, only DOT labeling was provided (dose rates, activity estimates, description of contents were not included). A licensee representative stated that containers of radwaste are stored, sometimes for weeks, waiting

for burial allotments and shipment. The inspector stated that although it appeared that requirements of 10 CFR 20.203(f) are being satisfied through the exception in 10 CFR 20.203(f)(3)(v), surveying for and labeling of hot spots like the one identified above should be considered for inclusion in the plant's radwaste handling program (50-321/81-10-04; 50-366/81-10-04).

Posting and control of contaminated areas was inspected for compliance with plant procedures and good health physics practices. Procedures HNP-8003, "Radiation Control Area Classifications", states in part that each contaminated area shall be conspicuously posted with a sign or signs bearing the radiation symbol and "Caution Contaminated Area." An access point to a contaminated area near the drum capping room in the Unit 2 radwaste building was not posted in accordance with HNP-8003 in that no barrier or sign was provided. Another access point to the same area contained double step-off pads and was properly posted. The inspector informed the licensee that failure to comply with the posting requirements of HNP-8003 is an example of failure to follow procedures in violation of Technical Specification 6.8.1 (50-321/81-10-05; 50-366/81-10-05).

Procedure HNP-8008 provides instructions for the issuance and implementation of Radiation Work Permits (RWP). The inspectors reviewed selective examples of RWPs to verify that appropriate requirements were listed for different tasks to be performed. It appeared that adequate controls were being maintained over the work supporting the Unit 1 outage (i.e., torus modifications, drywell work, surveys). Procedure HNP-8008 provides for the issuance of blanket RWPs for certain routine or repetitive work to operations, health physics and radiochemistry, plant supervisors, and designated inspection and surveillance groups. Blanket RWP 2-81-650 supports routine operator entries into RWP areas. It required rubber and cloth booties for entries into areas with double step-off pads. On April 13, 1981, a plant equipment operator was observed exiting the Unit 2 Condensate Backwash Receiver Pit without a set of cloth booties. On April 16, 1981, a review of RWP 2-81-650 indicated no entries had been made into the Condensate Backwash Receiver Pit on April 13. The inspector notified licensee management that failure to sign in on and comply with the dress requirements of Blanket RWP 2-81-650 was an example of failure to follow procedure HNP-8008 in violation of Technical Specification 6.8.1 (50-321/81-10-05; 50-366/81-10-05).

An inspector reviewed the plant's locked high radiation area key control system. On March 19, 1981, two contract workers were reported to have off-scale self-reading dosimeters as a result of entering a locked high radiation area without prior notification of health physics and without a survey instrument. Subsequent readout of the worker's thermoluminescent dosimeters indicated whole body doses of 441 and 730 millirems respectively. The licensee modified their key control system. Health physics now possesses and controls their own set of keys for locked high radiation areas. Any worker, other than from the operations department, must contact the health physics office in order to get the locked area opened.

Operations personnel have been instructed not to open any locked area for workers without a valid RWP. The inspector had no further questions regarding the control of locked high radiation areas.

9. Contamination Controls

During tours of the facility the inspector noted that compactable radwaste had been permitted to accumulate to a point where industrial and radiological safety concerns were raised. Bags of trash were thrown on top of ventilation ducts and piled nearly six feet high in an open area of the Unit 2 radwaste building. Fire hose stations near the Unit 2 compactor were blocked by 55-gallon drums. Health physics personnel stated that the need to clean up the area had previously been brought to the attention of management. The inspector was informed that a reactor operator (RO) had been given responsibility for radwaste control during the outage. However, the RO was consistently removed from radwaste activities when needed elsewhere. The inspector stated that during an outage, especially one which generates large amounts of radwaste, control of accumulation of radwaste should be a high priority of the plant. Licensee management acknowledged the comments of the inspector and initiated immediate clean-up actions. Substantial improvements were observed at the conclusion of the inspection. However, the inspector stressed the need for continued emphasis on radwaste control for the duration of the outage.

10. Surveys and Instrumentation

An inspector selectively reviewed records of surveys performed pursuant to the requirements of 10 CFR 20.201(b). Plant Procedure HNP-8012 provides instructions for conduct of radiation and contamination surveys. Procedure HNP-8008 states that a routine RWP may be issued for the duration of a job continuing for more than 24 hours provided surveys are taken every 24 hours as a minimum and continuous HP coverage is provided. An inspector verified that radiation and contamination surveys of the drywell, torus, turbine deck, and the manned control points were being conducted twice daily. The surveys appeared to be complete and thorough. The inspector had no questions or comments on the conduct of area surveys.

Procedure HNP-8005 establishes personnel unrestricted area release limits of less than 1000 dpm/HP210 probe area for beta/gamma fixed radiation and no detectable removable contamination on the skin and clothing. As a result of concerns raised by the Health Physics Appraisal inspection (50-321/80-27; 50-366/80-27) about the licensee's personnel contamination control program, a Confirmation of Action letter was issued July 3, 1980, to the licensee. Actions to be undertaken by the plant included performing whole body contamination surveys on individuals exiting any area where protective clothing was required. In response to that letter, the licensee stated on October 6, 1980, that workers have always been required to perform whole body surveys when exiting areas where protective clothing was required and that the supervisory staff and health physics staff would be more diligent

in enforcing this requirement. On April 15, 1981, an inspector observed the torus exit point with a licensee representative where 15 workers were exiting an area requiring full protective clothing. Of these 15, five were observed to perform no frisk; eight workers surveyed only their hands and feet. Procedure HNP-8011, "Protective Clothing Dressing and Undressing," requires each individual to perform a whole body contamination survey after leaving an area where full protective clothing was required. When the licensee representative confronted the workers, complete compliance with HNP-8011 was not achieved. The inspector stated that failure to perform a whole body contamination survey after exiting an area where protective clothing was required is an example of failure to follow procedure HNP-8011 in violation of Technical Specification 6.8.1 (50-321/80-10-05; 50-366/80-10-05).

An inspector reviewed the quantity and quality of protective clothing available for use during the outage. It appeared adequate quantities of protective clothing were available at the control points checked by the inspector. Procedure HNP-8007, "Laundering of Protective Clothing," provides instructions for the handling of radioactively contaminated protective clothing before shipment to and following receipt from an offsite laundry service. Following receipt of decontaminated laundry, radiation surveys are performed on each drum containing laundered protective clothing. A sample of clothing is removed from each container and selectively surveyed for radiation and contamination levels. Clothing with no smearable contamination and readings less than 1 mr/hr may be used for any authorized activity. If clothing reads between 1.0 and 5.0 mr/hr and no smearable contamination, it is stored for use in highly contaminated areas. Clothing which reads greater than 5 mr/hr is discarded as radwaste. Clothing which indicate smearable contamination are returned to the laundry service for re-washing. Workers also look for defective protective clothing which are discarded as radwaste. The licensee's launderer recently began air-testing each laundered glove for leaks. A licensee representative stated that this program should eliminate unusable clothing and gloves from the clothing issue storage bins.

During the inspection the inspector randomly surveyed protective clothing and examined gloves and booties for radiation levels and quality. No violations of the licensee's limits were identified. On April 15, 1981, the inspector asked the licensee to open two 55-gallon drums packaged and ready for shipment to a burial site and verified that protective clothing with readings greater than 5 mr/hr and unusable due to rips and holes are being discarded as radwaste.

An inspector reviewed the supply, calibration, alarm set points, and operability of selected portable survey instruments. During the inspection survey instruments in use at the health physics lab, the torus control point and the drywell control point, were found to have current calibrations and appeared to be in good operating condition. An adequate supply of portable survey instruments appeared to be available for the current outage. A

licensee representative stated that before the Unit 1 refueling outage, instruments were purchased through other NRC licensees in order to increase their supply of instruments to the present level.

On April 15, 1981, an inspector accompanied by licensee representatives, checked the alarm setpoints of 25 HP-210/RM-14 friskers throughout the plant and four hand and foot monitors and two portal monitors at the exit points of the controlled area. A 0.3 uCi Co-60 NRC check source was used. Each operable hand and foot monitor alarmed when tested although the monitor at door T17 did not audibly alarm. Not one detector on either portal monitor alarmed when tested. A licensee representative stated that the hand and foot monitors in conjunction with the requirements of HNP-8009, "Personnel Contamination Survey" and HNP-8001, "Protective Clothing Dressing and Undressing" ensure that no worker exits the site above the unrestricted personnel release limits. Procedure HNP-8114, "Radiation Monitor RM-14 Operation and Calibration", states in paragraph G.6 that the alarm setpoint for this instrument should be set "around 200 cpm above background". Of the 25 RM-14/HP-210 friskers inspected, 16 had alarm setpoints 300 cpm to greater than 500 cpm above background. The background readings obtained on April 15 were within 10% of the values recorded by the licensee when the setpoints were established. Alarm setpoints not in accordance with HNP-8114 is an example of failure to follow procedures in violation of Technical Specification 6.8.1 (50-321/81-10-05; 50-366/81-10-05). The inspector stated that even at 200 cpm above background, the survey instrument would not alarm at the personnel release limit of 1000 dpm per probe area assuming the normal 10% efficiency for the HP-210/RM-14 detector. The inspector verified that health physics technicians at the exit points of the controlled area monitor the instrument reading when surveying equipment or workers' hands and feet and direct workers to the decontamination area if greater than 100 cpm above background. However, whole body frisks are not performed at these locations. The inspector stated that the frisker setpoint value should reflect the personnel unrestricted area release limit.

11. Radwaste Shipping

On April 16, the inspectors observed activities surrounding the shipment of eight 55-gallon drums of spent resin. Contact readings up to 250 R/hr were recorded on the drums. Over 990 curies was contained in the shipment, principal isotopes being Co-60, Cs-137 and Cs-134. The shipment was a Type B shipment. The health physics coverage of the loading operation into the Chem-Nuclear 6601 cask appeared to be adequate. A licensee representative stated that the plant is not required to use certified slings for pallet and field plug lifting operations. After examination, the sling was replaced. A review of the shipping papers revealed no indication of Transport Groups I or II isotopes. The activity on the spent resin was from Unit 1 whose core contained over 15 leaking fuel elements this past cycle. A licensee representative stated that a strontium analysis (group II) is performed on a composite of liquid radwaste, but no estimate of isotopes in

Transport Groups I or II are made on radwaste shipments. The inspector stated that with over 990 curies of fission and activation products present, an amount of strontium large enough to be required on the shipping form would appear to be likely. The inspector stated that a method for determining Transport Groups I and II isotopes should be developed for radwaste shipments (50-321/80-10-06; 50-366/80-10-06).

The inspectors asked the licensee to open two drums of radwaste packaged and prepared for shipment to a burial site in order to determine if any free standing water was present. Of the two containers inspected, no free standing water was found. The inspector had no further questions.

12. Licensee Action on Previous Inspection Findings

(Closed) Open Item (50-321/79-34-05) - Review of IE Notice 79-07. Rupture of Radwaste Tanks. This item has been thoroughly reviewed by the licensee. The inspector had no further questions.

(Closed) Open Item (50-321/79-34-06) - Review of IE Notice 79-09. Spill of Radioactively Contaminated Resins. This Notice was thoroughly reviewed by the licensee. External solidification is not done at this facility but if ever contemplated this Notice will be subject to further review. The inspector had no further questions.

(Closed) Open Item (50-321/80-14-01) - Shipment of Radioactive Waste With Radiation Levels in Vehicle Cab Greater Than DOT Limits. A fine was assessed the licensee on this item. Licensee procedures and records are in order. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-01) - Need for Additional Health Physics Foreman. The licensee has added four additional foremen to the Health Physics staff and will review any need for additional personnel at the conclusion of the current outage. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-02) - Need for Additional Professional Positions. The licensee has added an assistant health physicist, to the plant staff. The plant health physicist has the title of health physics superintendent and is now a member of principal management. The inspectors had no further questions.

(Closed) Open Item (50-321/80-27-04) - Performance Audits of Radiation Protection Program. Audits of this program are presently conducted by the corporate and plant staffs and reviewed by upper management. Records indicated that the audits were being performed by individuals trained in health physics. The inspectors had no further questions.

(Closed) Open Item (50-321/80-27-05) - Assignment of Technicians to Responsible Positions. Licensee technicians have to qualify in given areas and be signed off by foreman, etc., prior to working in most phases of health physics. The inspector has no further questions.

(Closed) Open Item (50-321/80-27-06) - Establishment of a Formal On-The-Job Training Program for Technicians. After discussions with the licensee's training instructor, examining lesson plans, subject matter, etc., the inspector had no further questions.

(Closed) Open Item (50-321/80-27-07) - Full Time Training Specialist for Chemistry/Health Physics. The licensee's present training instructor appears to have a good understanding of health physics and conducts training sessions for the health physics technicians. The program appears to be adequate. The inspectors had no further questions.

(Closed) Open Item (50-321/80-27-08) - Technical Inaccuracies in General Employee Radiation Protection Training and Retraining Courses. The new program for training and retraining was reviewed. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-09) - Test for General Employee Training. Tests appear to have good content and are rotated such that cheating on exams is discouraged. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-10) - Evaluation of Nitrogen-16 Exposure. The licensee has received an evaluation from the Eberline Instrument Corporation and is using specific instrumentation for turbine entries. The inspectors had no further questions.

(Closed) Open Item (50-321/80-27-11) - Management Review of Radiation Exposure. The health physics superintendent prepares a Radiation Exposure Report which is reviewed by management at their monthly management meeting. The report includes exposures by department and by job. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-13) - Formal Periodic Evaluation of Respiratory Protection Program. The licensee's health physics supervisor and the assistant health physics supervisor are performing audits on an informal basis and in addition the quality assurance staff is formally conducting two health physics audits per year. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-14) - Improvement in Respiratory Protection Training. The trainer is well versed and is including training and classroom discussion on airborne activity, MPCs, etc. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-15) - Improved Recordkeeping for SCBA Tank Hydrostatic Test. The licensee's recordkeeping has been improved and appears to be adequate. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-18) - Air Sampling in Vicinity of Air Compressor Suction. Until the licensee completes the modification (moving of suction) the air is being sampled daily when in line respirators are issued by the health physics group. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-21) - Evaluation of Personnel Contamination Monitoring Instruments. The licensee has corrected the problems noted in this item including the use of a new source consisting of cobalt and cesium. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-23) - Scheduling Shipment of Solid Radioactive Waste. This function will remain within the licensee's health physics group. With the additional staff positions in the group, this should suffice. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-24) - Solid Radioactive Waste Volume Reduction Training for Plant Staff. This item is now being stressed during general employee training. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-25) - Revise Procedure for Surveying Shipments of Radioactive Waste. The licensee has revised Procedure No. HNP-80 and records are in order. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-26) - Review of Plant Procedures by Health Physics Staff. The health physics superintendent is now a member of the licensee's Plant Review Board and in addition a representative from health physics attends all outage meetings. The inspector had no further questions.

(Closed) Open Item (50-321/80-27-29) - Tritium Analysis Capability for the Plant. This item was thoroughly reviewed with the licensee. The licensee feels the sampling procedure is adequate and does not feel justified in the purchase of a liquid scintillator at this time. The inspector had no further questions.