

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-315/83-08(DRMSP); 50-316/83-09(DRMSP)

Docket Nos. 50-315; 50-316

Licenses No. DPR-58; DPR-74

Licensee: American Electric Power Service Corporation
Indiana and Michigan Electric Company
2 Broadway
New York, NY 10004

Facility Name: D.C. Cook Nuclear Plant, Units 1 and 2

Inspection At: D.C. Cook Site, Bridgman, MI

Inspection Conducted: April 27-29 and May 3-6, 1983

Inspector: *L. J. Hueter*
L. J. Hueter

6/23/83
Date

Approved By: *L. R. Greger*
L. R. Greger, Chief
Facilities Radiation
Protection Section

6/23/83
Date

Inspection Summary

Inspection on April 27-29 and May 3-6, 1983 (Reports No. 50-315/83-08(DRMSP); 50-316/83-09(DRMS))

Areas Inspected: Routine, unannounced inspection of the operational radiation protection program, including: procedures; radiological qualifications and training; external exposure control; internal exposure control; in-plant radiation protection program; advance planning/preparation; new instruments and equipment; effluent control instrumentation; testing of air cleaning systems; liquid waste processing and temporary storage of radwaste; transportation; NUREG-0737, Item II.B.3; and status of other NUREG-0737 items. The inspection involved 64 inspector-hours onsite by one NRC inspector.

Results: Of the 13 areas inspected, one item of noncompliance was identified (failure to perform an evaluation when whole body count data indicated exposure to greater than 40 MPC-hours - Section 8).

DETAILS

1. Persons Contacted

- *A. Blind, Performance Engineer Supervisor
- S. Dannhardt, Engineering Technologist
- J. Ersland, Chemistry Supervisor - Training
- J. Fryer, Radiation Protection Supervisor
- W. Ketchum, Senior Radiation Protection Engineer
- *T. Kriesel, Environmental Coordinator
- W. Lentz, Chemical Supervisor
- J. Nelson, Radiation Protection Engineer
- D. Palmer, Plant Radiation Protection Supervisor
- D. Schroeder, Radiation Protection Supervisor - Training
- W. Scott, Radioactive Waste Handling Supervisor
- *W. Smith, Jr., Plant Manager
- *J. Stietzel, QA Supervisor
- *B. Svensson, Assistant Plant Manager, Operations
- *E. Townley, Assistant Plant Manager, Maintenance
- J. Wojcik, Plant Chemical Supervisor

- *N. DuBry, NRC Resident Inspector
- E. Swanson, NRC Senior Resident Inspector

The inspector also contacted other licensee employees, including members of the technical staff.

*Denotes those present at the exit meeting.

2. General

This inspection, which began about 10:30 a.m. on April 27, 1983, included tours of: the reactor control rooms, radwaste processing, storage, and loading area; all levels of the auxiliary building; and the turbine building. In the auxiliary building, attention was directed toward postings and control measures for entrance/exit to contaminated areas, radiation areas, high and extreme high radiation areas. Attention was also directed to the CAMs located on each level of the auxiliary building and to general housekeeping. Housekeeping appears improved. This improvement coincides with the assignment of an individual to monitor housekeeping and elicit the aid and cooperation of work groups when needed.

3. Licensee Action on Previous Findings

(Closed) Open Item (315/78-28-01; 316/78-26-01): Lack of a formal procedure for quantifying noble gas releases from containment pressure ventings. Procedure 12 THP 6040 PER .401, titled, "Quantification of Radioactive Releases Made During Containment Pressure Relief," was issued and implemented on August 31, 1982.

(Closed) Open Item (315/80-23-03; 316/80-19-03): Action levels for assessment of whole body count results incompatible with the 40 MPC-hour control criteria specified in 10 CFR 20.103(b)(2). Procedure 12 THP 6010 RAD 409, titled, "Assessment of Whole Body Count Results," was modified by Revision 2 on April 19, 1983. As revised, the procedure appears compatible with 10 CFR 20.103(b)(2).

(Closed) Noncompliance Item (315/83-03-01; 316/83-03-01): Utilization of changes to procedures which had not been reviewed and approved in writing. The inspector observed that the inoperable flow measuring device had been replaced. Also, the inspector verified that reviewed and approved written changes to Procedure 12 THP 6020 LAB .038, for sampling VCT gas space using a Marinelli sample vessel, were implemented on March 25, 1983. Further, all other chemistry section sample procedures were reviewed to insure that each procedure reflected the current and correct method of sampling.

(Closed) Noncompliance Item (315/83-03-02; 316/83-03-02): Failure to operate sampling system valves in accordance with procedure. Personnel involved have been instructed in proper method of sampling the VCT gas space. Controls have been implemented requiring that the procedure for sampling the VCT gas space be in hand during the sampling process.

(Closed) Open Item (315/83-03-03; 316/83-03-03): Calibration concerns (linearity check and cap source traceability) for vent monitors 1R26 and 2R26. Calibration graphs in counts per minute versus concentration in $\mu\text{Ci/cc}$ were established for various concentrations of both fresh and decayed gases in 1978. At the time of that calibration the instruments' responses were also checked with a Westinghouse supplied strontium 90 cap source in a given geometry for use in subsequent calibrations. Subsequent one-point calibrations have been made using the cap source, with decay corrections; thereby establishing traceability. While the one-point calibrations do not verify linearity, it is noted that the one-point calibration is at a point fairly high on the range, in close proximity to the instantaneous gas release rate limit in Technical Specification 2.1.3. Therefore the instrument response should be accurate for significant releases. The licensee is in the process of installing new gaseous effluent monitors which have beta scintillator detectors rather than G-M detectors. Routine calibrations following initial gas calibrations will be performed using two traceable cap sources of different source strengths to verify linearity of response.

(Closed) Unresolved Item (315/83-03-04; 316/83-03-04): Possible exceeding of Technical Specification 2.1.3 (Gaseous release rate limit). The inspector reviewed and concurred with the licensee's detailed evaluation of instrument calibration and strip chart data which concluded that the release rate did not exceed about 92.4% of the release rate limit. This peak occurred for only about a minute.

(Closed) Unresolved Item (315/83-03-05; 316/83-03-05): Failure to classify a release (described above) as an unusual event, as required by emergency plan implementing procedure, when initial indications in the control room were that the technical specification release rate limit had been exceeded.

As noted in the preceding Item, it was determined that the release did not exceed the release rate limit imposed by the technical specifications and therefore did not require reporting as an unusual event. The licensee recognized the potential reporting problem during their review of the event. The cause was failure to recognize that releases from both unit vents had to be considered together in classifying a release. Both an operations memo and a change to Procedure PMP 2080 EPP .001, Emergency Plan Implementing Procedure, were issued to ensure operating personnel are aware that all release monitors need to be considered in total when classifying a release.

(Closed) Open Item (315/83-03-06; 316/83-03-06): Problems with the general condition of the nuclear sampling system. The inspector observed that all missing valve hand wheels have been replaced and unlabeled valves have been labeled with new permanent type labels. An inoperable flow meter has been replaced with a new flow meter.

4. Licensee Audits

No audits have been conducted in the area of radiation protection by plant, corporate, or contractor personnel since this area was last inspected in July 1982. The plant has scheduled a two-year audit frequency for this area.

5. Procedures

The inspector reviewed the following procedures revised in 1982 or 1983 to date:

12 THP 6010	RAD .335, 4-29-83, Gaseous Waste Releases
12 THP 6010	RAD .409, 4-19-83, Assessment of Whole Body Counting Results
12 THP 6010	RAD .447, 4-19-83, Whole Body Counting Procedure
12 THP 6020	PAS .011, 10-19-82, Post Accident Sampling for Hydrogen and Dilute Liquid and Total Gas Grab Sample
12 THP 6020	LAB .038 (Section 6.2), 3-25-83, Sampling of VCT Gas Space
12 THP 6040	PER .401, 8-31-82, Quantification of Radioactive Releases Made During Containment Pressure Relief
12 PMP 2080	EPP .001, 3-31-83, Emergency Plan Implementing Procedure

No significant problems were identified in the procedures reviewed.

6. Radiological Qualification/Training

One significant change in the organization/chain of command has taken place in the area of radiation protection. The Technical Superintendent,

to whom both the Plant Radiation Protection Supervisor and the Environmental Coordinator reported, has been reassigned to other duties. The duties of the Technical Superintendent have been divided between two individuals. However, title changes for these two individuals have not yet taken place. The Environmental Coordinator, Tom Kreisel, has been assigned the duties of the Technical Superintendent in the area of radiation protection, chemistry, environmental, and ALARA. The Plant Radiation Protection Supervisor, D. Palmer, now reports to the Environmental Coordinator.

Three radiation protection engineers, two of whom are spring 1982 graduates in health physics, still report to Mr. Palmer. One of these engineers, Jeff Nelson, has been assigned duties in internal and external dosimetry including the whole body counting program. The other engineer, Mary Glissman, has been assigned to follow special jobs and investigations linked to ALARA, and emergency planning duties, including offsite dose assessment. Also reporting to Mr. Palmer currently are the Radiation Protection Supervisor, J. Fryer, four radiation protection foremen, 18 company radiation protection technicians and four contractor technicians. There have been no technicians added to the staff since June 1982, but the number of junior technicians has decreased from eight down to two due to upgrading by training and experience. The number of senior technicians remains at six.

About 45 additional contractor technicians and three clerks were utilized during the most recent refueling outage. Resumes were submitted for review and approval before the contract personnel arrived. Training in license procedures and practices was provided.

A pilot program initiated in June 1981, involving financial assistance for local high school graduates in obtaining formal education and cooperative experience in the plant's RP section is continuing. Eight trainees are nearing completion of their second (final) year and will be obtaining associate degrees while ten others are completing their first year. The licensee anticipates offering the trainees job opportunities in the radiation protection and operations organizations. Some of the trainees may be used to replace the long term contractor radiation protection technicians at the site.

Discussions with the Radiation Protection Supervisor - Training and review of training records related that the formal training program initiated in July 1982, with a goal of providing about 100 hours of training per year for technicians, is about on schedule. The program provides training for job progression and for biennial requalification. For continuity, a small group of about four technicians are provided about 3 full days training at a time on related topics. Tests are given both before and after presentation of the training material. The training involves lectures, video presentations, and practical demonstrations.

A similar training program is provided for chemistry technicians by the Chemistry Supervisor-Training. It includes a review of chemistry procedures

and simulated drawing of a liquid and gas sample from the post-accident sampling system (and review of the Emergency Plan in general) every six months. It includes use of anti-contamination clothing and respiratory equipment.

On a back shift, two radiation protection technicians (one plant and one contractor) were interviewed and were knowledgeable of plant radiation protection procedures and practices. No problems were identified during the inspector's review of the licensee's program of training and retraining of radiation workers. Proper use of friskers for contamination control and use of ALARA Principles were stressed during general employee training.

No items of noncompliance or deviations were identified in the area of radiological qualification/training.

7. External Exposure Control

The licensee's personnel monitoring program utilizes monthly (with option for early processing) beta-gamma type TLD from Eberline. Neutron dose rate surveys are performed on startup following outages and for subsequent occasional entries into the few areas (such as the accumulator rooms and certain parts of the annulus) where detectable neutron dose rates exist during reactor operation. During 1982, in which two refueling outages occurred, the total dose at the plant was about 643 person-rems, about identical to the 650 person-rems received in 1981. Records show that no overexposure occurred and that no individual at the plant exceeded four rems during 1982 and that only two individuals exceeded three rems for the year.

The licensee is developing a formalized program for spiking TLDs. A new procedure was initiated in January for spiking 15 badges to gamma radiation from cesium-137 in the range of 50-1000 mrems using the guidance provided in NUREG/CR-2891 and 2892. In the two tests completed to date, the analyses showed the badges were well within the acceptance criteria of the guidance, however in both cases the badges averaged about 10% low compared to the planned exposures. Possible causes are being evaluated including calibration of the Victoreen R chamber. The licensee plans to have the National Bureau of Standards calibrate the meter in the future.

The Radiation Exposure and Maintenance Management (REM) System described in Inspection Reports No. 315/80-23; 316/80-19 is gradually being utilized more fully but is still not complete. More door control points will be added for refinement of area dose information. The system can reproduce any RWP, including all people who worked under the RWP and their external dose received under the RWP. Eventually it is intended to also provide internal exposure in MPC-hours for each individual.

No items of noncompliance or deviations were identified.

8. Internal Exposure Control

For control of internal exposures, the licensee utilizes a program consisting of engineering controls, survey data, stay-time calculations,

decontamination of surfaces, and protective clothing and equipment. Whole body counting is used to evaluate the effectiveness of the preventative measures. Both incoming and terminating whole body counts are performed for outage personnel. For plant personnel, whole body count frequencies are two years for office personnel, one year for department and section heads, six months for first line supervisors and operators, and four months for maintenance, auxiliary operators, waste handlers, radiation protection, and chemistry personnel. Special counts are conducted following incidents with potential for significant uptakes, and the licensee is initiating a program for random selection of individuals for whole body counting for evaluation purposes. The licensee apparently has a policy which restricts plant access because of excessive facial hair. This matter was discussed at the exit meeting.

For the period from August 1, 1982, through March 15, 1983, the inspector reviewed the whole body count results of 863 individuals. Except as noted below, no problems were identified. The whole body count data of one employee was indicative of exposure exceeding the 40-hour control measure, which requires pursuant to 10 CFR 20.103(b)(2) performance and documentation of an evaluation and the taking of actions necessary to assure against recurrence. On January 14 and 15, 1983, the whole body count data of a terminating employee showed 95 nCi and 75 nCi of Cobalt 60, respectively. Both counts were greater than the 40-hour control measure (about 56 nCi for long term component) for insoluble cobalt 60 deposited in the critical organ (lungs). Although a notation in the data of the first count made reference to "chest contamination", further counts were not performed to determine if actual uptake was below the 40-hour control measure; nor did the licensee perform and document the required evaluation and actions to assure against recurrence, as required if the 40-hour control measure was exceeded as was indicated by the limited data. The failure to adequately evaluate whether the 40-hour control measure was exceeded is considered noncompliance with 10 CFR 20.201(b) (315/83-08-01; 316/83-09-01).

9. In-plant Radiation Protection Program

a. Surveys

The inspector selectively reviewed radiation, contamination, and airborne radioactivity surveys conducted for routine surveillance and for radiation work permits for 1983, through the inspection date. No problems were identified.

b. Posting and Access Control

During plant tours, radiation areas and high radiation areas were found properly posted and access to high radiation areas were locked. No problems were identified.

c. Interim Storage of Packaged Radwaste

The licensee effectively maintains a low inventory of packaged radwaste in storage. At the time of the inspection, the inventory

included two 170-cubic foot liners, scheduled to be shipped out the following Monday, 64 low level activity drums scheduled to be shipped out at the end of the month, five high level activity drums and four 90-cubic foot boxes of low level activity waste.

d. Release of Materials for Unrestricted Use

The licensee has a tagging/survey system for release of materials for unrestricted use. Sensitive Eberline Micro R Meters are utilized to survey trash before it is released to verify the absence of detectable radioactivity. The same survey instruments are used to survey the construction scrap yard weekly during outages and monthly at other times to assure that contaminated items are not leaving the plant by this pathway.

e. Radiation Work Permits (RWPs)

RWPs are prepared by plant (not contractor) radiation protection personnel. "Extended" RWPs are written to cover a six-month period for routine duties such as drawing samples for analysis; operator tours and inspections; area decontamination and trash collection; inspection and operation of radwaste systems; security tasks; laundry pickup and operation; and initial job planning, inspection, and evaluation. For non-routine duties, RWPs are prepared as needed for a shorter period of time, typically a month or less. A number of both types of RWPs were reviewed. In addition to designating protective clothing required and listing dose rates and contamination levels in the work area, the RWPs contained instructions, when appropriate, concerning dose rate meter requirements, radiation protection notification requirements, airborne activity surveillance requirements, and respiratory protection requirements. If airborne concentrations are greater than 25 percent of MPC, MPC-hours are calculated. No problems were identified in review of the RWP system.

10. Advance Planning and Preparation

The licensee has contracted with Proto Power to develop a Radiation Protection Plan which includes a formal ALARA program. The plan/program is nearing completion. An ALARA coordinator has recently been selected to report to the Environmental Coordinator. The individual has construction/mechanical background and is beginning specialized training for the job. Specific tasks with potential for significant exposure have been assigned to the radiation protection engineers for planning and job following in the interest of ALARA.

During the last outage the licensee made efforts to increase work efficiency and reduce exposure by scheduling people to work normal eight hour shifts. A contractor trailer for cleaning/sanitizing respiratory equipment was used during the last refueling outage. This helped eliminate a housekeeping problem involving the lack of dirty mask storage while awaiting cleaning. Further, one individual has been assigned to make tours

of the auxiliary building to identify and correct housekeeping problems. Housekeeping has improved under this system.

11. New Instruments and Equipment

Two new Eberline PRM-7 portable micro R meters, sensitive to very low levels of activity, are being used to survey trash before release from the site. These meters are also used for general surveys outside the fenced area, for the construction dump area, and for lay down areas. The instrument was initially calibrated by Eberline. The licensee is completing a procedure to calibrate the instrument in-house.

The licensee has on order a scintillation (sodium iodide) detector to be used with a count rate meter. This unit will be used as a high sensitivity frisker, in part, to locate low level contamination detected by the sensitive liquid scintillation portal monitors which have been in use the past year.

Other equipment/instrumentation is being installed to satisfy NUREG-0737 requirements.

12. Effluent Control Instrumentation

The gaseous effluent monitor calibration data was reviewed for both Units (1R26 and 2R26) for compliance with Technical Specification 2.1.4.d. The only weakness identified involved the lack of a linearity verification (as previously discussed in Section 3) of the current monitors, which are being replaced. Calibration of the new system will include a linearity verification.

The liquid monitor calibration data was reviewed for the single monitor (1R18) for compliance with Technical Specification 2.1.2.f. No problems were identified other than the continuing problem of a high background. As noted in previous inspection reports, licensee efforts to reduce the background levels by relocating the monitor and flushing with rinses, including acid, have met with partial success. Replacement of the monitor is planned. (315/80-23-06; 316/80-19-06).

13. Testing of Air Cleaning Systems

The inspector reviewed the surveillance tests conducted on the control room emergency ventilation system, the engineered safety feature ventilation system, and the spent fuel storage pool exhaust ventilation system, for compliance with surveillance requirements of Technical Specifications 4.7.5.1.c, 4.7.6.1.b, and 4.9.12.b, respectively. The tests required demonstration of removal by the in-place HEPA filter banks of at least 99 per cent of the DOP particles and removal by the in-place charcoal adsorbers of at least 99 per cent of a halogenated hydrocarbon refrigerant test gas, while operating the respective ventilation systems at rated flows. The tests also included required demonstration (by laboratory analysis of a carbon sample from each filter system) of a removal efficiency of at least 90 per cent for methyl iodide at 130° C and 95 per cent relative humidity. The in-place tests were performed by Nuclear Containment Systems and the laboratory tests were performed by American Air

Filter. Records reviewed showed that required tests, utilizing the required test conditions, have been conducted in the past 18 months on all three systems. All tests have demonstrated that the filters have met or exceeded the required efficiency.

No items of noncompliance or deviations were identified.

14. Liquid Waste Processing and Temporary Storage of Radwaste

There are no technical specifications or license conditions for temporary storage of liquid and solid radwaste. Liquids are processed by filters, resins, or evaporators to minimize activity in plant liquids. Installation of a new 15-gpm waste evaporator is nearing completion. The licensee's conduct of a 10 CFR 50.59 review was verified during a previous inspection (July 1982). The licensee's limiting of storage of solid radwaste to small quantities has been discussed in Section 9. By establishing and backing a program aimed at both liquid and solid radwaste volume reduction, the licensee has succeeded in reducing the volume of radwaste shipments by about 50 per cent, to about 25,500 cubic feet in 1982, compared to 1980.

No items of noncompliance or deviations were identified.

15. Transportation

The licensee has had no spent fuel or Type B quantity shipments to date although Type B casks continue to be used on occasion for shielding purposes. The inspector reviewed Procedure THP 6010 RAD.303, Revision 2, dated March 30, 1983 titled, "Solid Waste Handling and Drumming." No problems were identified with the procedure, which included instructions for shipment preparations. The licensee also had vendor supplied procedures/certificate of compliance packages for each of the casks used for radwaste shipments. These procedures all appeared to be current with respect to burial site criteria and NRC/DOT regulations. Certificate of compliance maintenance requirements for casks are being performed by the cask vendors at required frequencies based on information obtained by the licensee from the cask vendor.

The inspector selectively reviewed shipment records including inspection/check-off sheets for various types of shipments made to radwaste burial sites at both Barnwell, South Carolina, and Richland, Washington, from July 1982 through March 1983. No problems were identified.

No items of noncompliance or deviations were identified.

16. NUREG-0737 Item II.B.3, Post Accident Sampling

The licensee previously notified NRC (letter dated December 14, 1982 from R. S. Hunter) that the Post-Accident Sampling (PAS) System was installed and operable (capable of obtaining a sample) in both Units No. 1 and No. 2. The licensee also stated that they had investigated the normal sampling valves inside containment for possible improvement or replacement. This

investigation concluded that only minor modifications, limited to the replacement of specified radio-sensitive "O" rings, was needed. The letter stated that the modifications notwithstanding, the licensee believes that the system as installed fulfills the requirements of NUREG-0737, Item II.B.3.

The "O" rings had not been replaced as of the inspection date. The PAS system was briefly reviewed during a previous inspection (315/82-24; 316/82-24) and was reviewed further during this inspection. The system appears to be completely installed. An L shaped shield wall consisting of about one inch of lead sheet sandwiched between two layers of solid concrete block has been added to the alternate counting facility located in the old guardhouse in response to concerns regarding adequacy of shielding raised during the previous referenced inspection. Procedures have been written and approved for sample collection and analysis. Training has been conducted for those who would be responsible for taking and analyzing samples.

NRR is reviewing this item for conformance to NUREG Clarification Items. This item remains open pending completion of NRR's review and any necessary followup inspection actions.

17. Status of Other NUREG-0737 Items.

a. Noble Gas Effluent Monitoring, Item II.F.1, Attachment 1

The type and general location of the extended range noble gas effluent monitors was briefly described in a previous inspection report (315/81-26; 316/81-29). The licensee by letter dated December 24, 1982, requested an extension of the implementation date for this item to May 31, 1983. The request was necessitated by failure of some electronic interface boxes for the main steam safety valve/power operated relief valve monitors. The failures were apparently caused by high ambient temperature, even though the items had been purchased with high operating temperature specifications. A second reason for the delay request was moisture problems affecting the steam jet air ejector and gland steam condenser vent monitors, even after installation of moisture separators and heat tracing.

An NRC Order issued March 14, 1983, confirms the licensee's commitment to implement this post-TMI item (NUREG-0737, Item II.F.1, Attachment 1) by May 31, 1983. This matter will be reviewed further during a future inspection.

b. Iodine and Particulate Effluent Sampling and Analysis, Item II.F.1, Attachment 2; High Range Containment Monitor, Item II.F.1, Attachment 3

The type and general location of the iodine and particulate sampling system and the high range containment monitors were briefly described in a previous inspection report (315/81-26; 316/81-29).

The NRC Order issued March 14, 1983, confirmed the licensee's commitment to implement the post-TMI item for iodine and particulate

effluent sampling and analysis (NUREG-0737, Item II.F.1, Attachment 2) by April 30, 1983, and showed the post-TMI item for the high range containment monitor (NUREG-0737, Item II.F.1, Attachment 3) as complete. These items were reviewed during this inspection to verify their status. The licensee did not have documentation to show that the clarifications in NUREG-0737 were satisfied for these items. This matter was discussed at the exit meeting. Additionally, several specific problems, discussed below, were identified for these items.

On April 29, 1983, the licensee issued a letter (Alexich to Denton) to the NRC stating that the post-TMI item for iodine and particulate sampling could not be operational by April 30, 1983, due to continuing problems of excessive moisture in sample lines. To compensate for the moisture problem, a separate sampling system had been installed on the air ejector effluent pathways. Additionally, temporary modifications had been made to the Unit Vent Monitoring System to provide effluent discharge to the Auxiliary Building Ventilation System. The letter stated that it was believed that these modifications provided the capability to obtain iodine and particulate samples as required by NUREG-0737, Item II.F.1, Attachment 2.

The licensee's April 29, 1983 letter also stated that the post-TMI item for the high range containment monitor was not complete (the trending and recording function of the Unit 2 system was not operational), and that a previous licensee letter, dated November 5, 1982, had indicated that this item was not complete. The April 29 letter stated that the high range containment monitor was expected to be completed shortly.

Subsequent to this inspection the NRC sent a letter, dated May 10, 1983, to the licensee (Varga to Dolan). This letter acknowledged the licensee's April 29, 1983, letter but noted that the system described as in place to meet the intent of Item II.F.1 Attachment 2 was not the system previously described to the NRC and therefore had not been reviewed by the NRC and further noted that portions of the system are listed as temporary. The letter further stated that while the "separate system" may be sufficient to satisfy Item II.F.1 Attachment 2, the licensee should correct the problem with moisture in sampling lines and complete the originally planned system. Also, the letter acknowledged that Item II.F.1 Attachment 3, high range containment monitors, were not complete and requested that the licensee provide completion dates for both the iodine/particulate sampling system and the containment high range monitors.

18. Exit Meeting

The inspector summarized the scope and findings of this inspection during a meeting with licensee representatives (denoted in Section 1) at the close of the inspection on May 6, 1983. In response to certain items discussed by the inspector, the licensee:

- a. Acknowledged the item of noncompliance. The inspector stated that although recent revisions to procedures should preclude recurrence, problems with the procedures for assessment of whole body count data had been emphasized in previous inspection reports over the past year and a half. (Section 8)
- b. Acknowledged the inspector's statement that no written response had been received to the NRC's (Region III) letter dated February 28, 1983, requesting a statement of the licensee's policy concerning facial hair and its effect on access to licensee facilities. The licensee stated that much thought had been given to the matter and that a written response would be provided within a month. (Section 10)
- c. Acknowledged the inspector's comments regarding the D.C. Cook plant's failure to provide document(s) certifying that clarification items are met for NUREG-0737 Items. (Section 17)