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MEMORANDUM FOR: File Docket Nos. 50-277
50-278
Peach Bottom Units 1 and 2

THRU: P. J. Knapp, Chief
Facility Radiological Protection Section (FRPS) *PK 10/26/81*

FROM: R. L. Nimitz, Radiation Specialist, FRPS

SUBJECT: FAILURE TO FOLLOW RADIATION PROTECTION PROCEDURES

- References:
1. - Memo: P. Knapp to G. Smith dated February 9, 1981, Recommendation for Management Enforcement Conference with Philadelphia Electric Company
 2. - Memo: P. Knapp to J. Joyner dated March 3, 1981 Recommendation for Management Enforcement Conference with Philadelphia Electric Company, Docket Nos. 50-277 and 50-278
 3. - Memo: P. Knapp to J. Joyner (not dated, written approximately March 23, 1981) Recommendation for Management Enforcement Conference with Philadelphia Electric Company
 4. - Memo: E. C. McCabe to J. Joyner dated March 23, 1981, Peach Bottom Health Physics Issues

NOTE: Each of the above memorandums deal with failure to follow rad protection procedures at Peach Bottom and the apparent need for some regional action to correct this situation. Each of the above memos are attached.

As a result of the continuing apparent failure to follow radiation protection procedures at Peach Bottom, a special radiation protection inspection was conducted during the period April 14-16, 1981. The primary purpose of the inspection was to review controlled area work in progress to identify any examples of individuals (station or contractor) failing to adhere to radiation protection procedures, and attempt to determine the cause of this failure and request appropriate corrective actions. This inspection request was documented in a memorandum dated April 13, 1981. (See Attachment 5)

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In addition to this above special inspection, a review of the previous items of noncompliance was conducted to determine if the recurrence was caused by some item such as too strict procedures, inadequate corrective actions, etc.

The items of noncompliance, the licensee's response and my comments are presented in Attachment 6.

The review of the nine items of noncompliance indicated the following:

Item	INSTANCES			
	<u>Non-H&S Related¹</u>	<u>May be H&S Related</u>	<u>H&S Related</u>	<u>Total</u>
Failure to sign in on RWP		1	2*	3
Failure to adhere to RWP	2			2
Failure to sign out on RWP	1			1
Improper Dosimetry	1	1	1	3
No RWP			1	1
Posting Adherence	1		1	2
No Posting	1			1
Proper Use of Respirators			1	1
	<u>6</u>	<u>2</u>	<u>6²</u>	<u>14</u>

*entered area with substantial potential hazards and did not familiarize themselves with the hazards and precautions shown on the RWP.

¹ H&S = Health and Safety

² Improper dosimetry and no RWP were cited as one item however, they were repeated for purposes of the table

Evaluation

During the special inspection performed to review worker adherence to radiation protection procedures (Inspection Report No. 50-277/81-10; 50-278/81-11) controlled area work in progress was reviewed. One item of noncompliance dealing with workers' failure to sign out on RWPs as required by T.S. 6.11 radiation protection procedures and one item of noncompliance dealing with air sampling were identified. No other instances of worker failure to adhere to radiation protection procedures was apparent.

The previously observed recurrent noncompliance may have been due to the combination of (1) a large number of workers on site and (2) no "strong" action by the licensee.

The lack of numerous examples of failure to follow radiation protection procedures during the special inspection may be the result of the "Employee Refresher Training", given by the licensee during April and May of 1980. This training dealt with following radiation protection procedures, housekeeping, and security procedures. It may also be due to the licensee's distribution of "Special Nuclear Plant Rules" which deal with security, health physics and safety (distributed around December 1980).

Also, it appears that the licensee may be taking "stronger" action against individuals failing to follow radiation protection procedures including: meetings between all personnel involved, oral warnings, letters to workers' supervisors and counseling of workers and supervisors.

The review of the items of noncompliance and licensee responses thereto indicate that the licensee's actions taken so far seem to have corrected the situation. However, there appears to be a need for greater oversight of ongoing work by first line supervision and health physics to ensure radiation protection procedures are adhered to.

Original Signed By:

R. L. Nimitz
Radiation Specialist

Enclosures: As stated

cc w/encls:
P. Knapp
J. Joyner
E. McCabe
T. Martin

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