ATTACHMENT 5

13 APR 1981

MEMORANDUM FOR: File, Docket Nos. 50-277, 50-278

THRU: P.J. Knapp, Chief, Facility Radiological Protection Section

FROM: R.L. Nimitz, Radiation Specialist

SUBJECT: REGIONAL REQUEST FOR RADIATION PROTECTION INSPECTION AT PEACH BOTTOM

This memorandum will serve to document the regional request for a special radiation protection inspection at the subject facility. This inspection will be conducted to review the circumstances and cause of workers apparently failing to follow radiation protection procedures. If such failure is found, appropriate corrective action will be requested of the licensee.

The inspection (Combined Inspection No. 50-277/81-10, 50-278/81-11) is scheduled for April 14-16, 1981 and will primarily involve review of controlled area work in progress.

R L Nimitz

R. L. Nimitz
Radiation Specialist

cc:
T.T. Martin, Acting Director, DETI
J.H. Joyner, Chief, TIB
R.R. Keimig, Chief, PB#2
E.C. McCabe, Chief, RPS 2B
C. Cowgill, Resident Inspector

Attachment 6

The following paragraphs provide a brief description of each Technical Specification 6.11 citation issued to Peach Bottom since September 1979, the licensee's response and a short narration evaluating that response.

1. Report 50-277/79-23; 50-278/79-25

Inspection conducted September 1-30, 1979. Enforcement letters issued November 14, 1979 (Radiation Support concurrence).

a. T.S. 6.11 Report Item 1

Failure of two individuals (September 17, 1979) to tape coverall openings as required by their RWP.

Licensee Response

The workers were pouring fresh decon solution into a decon machine when they were identified as failing to adhere to their RWP. The licensee's corrective action was to interrupt and re-instruct the workers in adhering to their RWP.

Comments

No radiation or contamination levels were presented in the inspection report. However, based on review of similiar operations no health and safety concern would appear to be present by merely pouring solvent into a decontamination machine.

b. T.S. 6.11 Report Item 2

Failure of 11 individuals to sign out all data required by RWP.

Licensee Response

Individuals were identified and requested to provide information. The individuals were also instructed at this time to use correct RWP procedures.

Comment

Failure to sign out does not represent a health and safety matter. No indication was given in the report as to airborne or radiation levels.

c. T.S. 6.11 Report Item 3

Failure of two individuals to sign in on RWP.

Licensee Response

Area entered exhibited radiation and contamination levels less than that required for an RWP. Individuals had read the permit but had just not signed in. Workers were re-instructed in requirement.

Comment

Failure to sign in on a RWP is considered a matter with health and safety significance.

Regarding long term facility wide correction action for the above items, the licensee indicated training was made aware of this item and was to upgrade their training program to place more emphasis on the importance of RWP adherence. Additionally, routine QA audits would continue to be made of RWP compliance.

NOTE: During discussions with training personnel at Peach Bottom on April 14-16, 1981, it was determined that the training department was placing special emphasis on RWP adherence.

2. Report 50-277/79-29; 50-278/79-32

Inspection conducted November 1-30, 1979. Enforcement letter issued February 8, 1980 (No Radiation Support Section concurrence on report or acknowledgement letter).

T.S. 6.11 Item

Failure of one operations staff member to sign in on RWP on November 8, 1979.

Licensee Response

Operator was responding to possible emergency situation (steam leak). The individual was knowledgeable in halth physics and entered the area with a survey meter. The RWP procedure contains certain provisions for entering a radiation area to expedite work or inspection without filling out a RWP first.

Operations staff and operating personnel were reminded of the importance of following RWP procedures. In order to clarify the circumstances for which an expedited entry is permissible, a review of the procedure will be performed and appropriate revisions made as required.

Comments

The report does not indicate if the individual signed the RWP after his exit. Since the individual was apparently knowledgeable in health physics and had a survey meter, no health and safety concern is apparent by not signing in on the RWP.

3. Report 50-277/79-30; 50-278/79-33

Inspection conducted December 1-31, 1979. Enforcement letter issued April 21, 1980 (Radiation Support concurrence on report and acknowledgement letter).

T.S. 6.11 Item

Failure of one individual to tape coveralls as required by RWP.

Licensee Response

Individual immediately re-instructed to tape openings. Several station staff members have recently conducted formal lectures with site personnel to re-emphasize this need.

Comment

No contamination levels were presented in the report.

4. Report 50-277/80-01; 50-278/80-01

Inspection conducted January 1-31, 1980. Enforcement letter issued July 31, 1980 (Radiation Support Section concurrence)

T.S. 6.11 Item

One of two individuals found (January 7, 1980) in an RWP area without dosimetry. Also no RWP was in effect.

Licensee Response

Work was halted. The licensee worker and contractor worker involved were counseled. A training program was held in April 1980 to re-familiarize contractor and utility personnel with Health Physics related procedures and information.

Comment

Radiation and contamination levels were low in the area (< 2 mR/hr < 600 dpm/100 cm^2) and the area did not need a RWP. However, because the area (Hot Tool Room) was subject to changing conditions a RWP was required. This failure to wear any dosimetry and obtain a RWP represents a significant health and safety matter.

5. Report 50-277/80-05; 50-278/80-05

Inspection conducted March 1-31, 1980. Enforcement letter issued September 24, 1980. (Radiation Support concurrence)

T.S. 6.11 Item

Failure of one individual to wear required dosimetry in turbine building 165' elevation.

Licensee Response

Health Physics Investigation initiated. Worker stated it was an inadvertent action. Copy of report forwarded to worker's supervisor.

Comments

Report does not present radiation dose rates that the individual was working in. No long term, facility wide corrective action taken. The November 19, 1980 acknowledgement letter does not address this matter. May represent a health and safety matter if high radiation area entered.

6. Report No. 50-277/80-08; 50-278/80-07

Conducted April 1-30, 1980. Enforcement letter issued October 28, 1980 (Radiation Support Section concurrence).

a. T.S. 6.11 Item 1

Evidence of smoking in non-approved general plant smoking areas.

Licensee Response

Regulations concerning [illegible]ing, eating and drinking were discussed during the employee refresher training held during April and May. All site personnel will be receiving written instructions on use of proper smoking, eating and drinking areas.

NOTE: Licensee in letter dated December 4, 1980 indicated personnel would by December 31, 1980 receive copies of "Special Nuclear Plant Rules". This is an instructional booklet containing various do's and dont's for nuclear plant work.

Comment

Corrective action appeared adequate. Smoking, eating and drinking in non-approved areas is a significant health and safety matter.

b. T.S. 6.11 Item 2

Three individuals working on April 8, 1980 at the Unit 2 CRD control station had not read, signed in on or provided required data prior to working at the station.

Licensee Response

Individuals re-instructed in requirements. Refresher training given during April and May of 1980. Additionally, Special Nuclear Plant rules which will address, among other items, the necessity to adhere to radiation protection procedures is to be distributed to personnel.

Comments

This item had health and safety significance. The licensee's actions appear to be adequate to preclude recurrence.

7. Report 50-277/80-11; 50-278/80-11

Inspection conducted April 22 to May 19, 1980 (N. Dubry, RIII Radiation Specialist). Enforcement letter issued September 24, 1980.

T.S. 6.11 Item

Three individuals failed to perform negative pressure test of respirators.

Licensee Re.ponse

The three individuals were not identified by the inspector so immediate counseling was not possible. The requirement to perform a negative pressure test is covered in classroom instruction as well as the equipment fitting phase of respiratory training.

Comments

Report does not indicate that the individuals commenced work without performing the test. The licensee's response does not indicate that this item will be reinforced. However, our acknowledgement letter dated November 19, 1980 indicates the respirator training program will be modified to place more emphasis in this area. This is a health and safety matter.

NOTE: During review of respirator fitting at Peach Bottom on April 14-16, 1981, workers were noted to be required to demonstrate a negative pressure test and were instructed when to perform such a test.

8. Report No. 50-277/80-26; 50-278/80-19

Inspection conducted July 24-28, 1980. Enforcement letter issued September 24, 1980 (Radiation Support concurrence).

a. T.S. 6.11 Item 1

Failure to properly post a contamination area.

Licensee Response

It appeared that a decontamination crew removed the barriers and signs, decontaminated the area and was awaiting an H.P. technician to survey and clear the area when the inspector identified the unposted area. The crew leader was counseled and instructed to remain aware of activities in his area of responsibility and conduct them in accordance with approved procedures.

Comments

Pre decontamination survey indicated contamination levels ranging from 1,000 to 8,000 dpm/100 cm^2. This is below the licensee's current limit (10,000 dpm/100 cm^2) requiring an RWP. The contamination did not represent a signficant health and safety hazard. Licensee corrective action did not address long term facility wide corrective action.

b. T.S. 6.11 Item 2

Failure to wear proper dosimetry. Two workers had their own Harshaw badges but had inadvertently switched their Eberline TLDs with one another.

Licensee Response

Exchange had occurred after their exit from the drywell at a change area. Individuals were re-instructed in requirement to use own dosimetry. Security force re-instructed in requirement to ensure personnel have proper dosimetry. Also the licensee conducted an audit of approximately 1,200 badges and found no other instances of exchanged dosimetry.

Comment

Since the workers did have other correct dosimetry on, the item did not represent a significant health and safety hazard.

9. Report No. 50-277/80-33; 50-278/80-26

Inspection conducted November 8-30, 1980. Enforcement letter sent March 3, 1980 (No Radiation Support Section concurrence on report or acknowledgement letter)

T.S. 6.11 Item

Three individuals crossed a rope barrier (November 25, 1980) without reading the instruction. Barrier set up was for a Radiation Area while the boundary of a High Radiation Area was being established therein. (Two contractor H.P. technicians, one worker, no meter).

Licensee Response

A Radiation Protection technician inside the rope barrier was maintaining positive control of the area and it was expected that he would have encountered, and properly directed, the three individuals who were instead identified by the inspector. All individuals who are employed on site receive General Employee Training which includes instruction to read and obey all posted signs, including those associated with radiation areas.

Comment

Because the area was posted as a Radiation Area and a technician had positive control of this area, this item does not appear to be a significant health and safety item. However, in general, failure to adhere to posting and barricading, particularly High Radiation Area posting and barricading is a significant health and safety matter.

The licensee's corrective actions did not address long term facility wide measures to prevent recurrence e.g. stressing of adherence to posting and barricading in future radiation protection training programs.