



PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

December 7, 1981

Re: Docket Nos. 50-277
50-278

Report No. 50-277/81-10
50-278/81-11

Mr. R. R. Keimig, Chief
Projects Branch #2
Division of Resident and Project Inspection
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Keimig:

Your letter of November 9, 1981, forwarded combined Inspection Report Nos. 50-277/81-10 and 50-278/81-11. Appendix A addresses two items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. Item A is categorized as a Severity Level IV Violation and item B as a Severity Level V Violation. Both are restated below with our responses.

- A. 10 CFR 20.103(a)(3) states in part, "For purposes of determining compliance with the requirements of this section, the licensee shall use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas..."

Contrary to the above, during welding of a control rod drive-under vessel winch on April 15, 1981, suitable

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measurements of concentrations of airborne radioactive materials were not made in that the air sampler position (upstream and at least 10-15 feet away from the welding operation) precluded the collection of a sample representative of the worker's breathing zone. The individual was welding material from which radiation as high as 8 millirad/hour (fixed contamination) had been measured.

Response

Personnel error was the cause of this infraction. Investigation of this event revealed that although the air sample taken may have not been representative, the worker was supplied with breathing air which provided a protection factor of two thousand. Based upon the contamination levels present, this provided ample protection for the worker. The individual Health Physics technician responsible for the error was disciplined by supervision. All other Philadelphia Electric Company technicians were instructed on April 28 and 29, 1981, as to the importance of taking proper air samples. Similar instructions were given to all contractor technicians. Additional guidance was given to assure that air samples taken around workmen are representative of the workers' breathing zone.

- B. Technical Specification 6.11 states in part, "Procedures for personnel radiation protection shall be prepared...and adhered to for all operations involving personnel radiation exposure."
- 1. Health Physics Operating Procedure HPO/CO-4, "Radiation Work Permit", Revision 16, requires in part in Section VI.3 that on entering an RWP area each person shall provide time of entry and pocket dosimeter reading prior to entering. Upon exit from the area, the time out and exposure received shall be indicated on the RWP Access and Exposure Control form.

Contrary to the above, the following RWP Access and Exposure Control forms were not completed:

<u>RWP No.</u>	<u>Date</u>	<u>Number of Individuals Not Signing In and/or Out Properly</u>	
3-94-0194A	4/13/81	- No dose in or out	1
		No dose out	2
3-94-0108A	4/13/81	- No dose out or time out	1
	4/7/81	- No time out or dose out	1
	4/6/81	- No time out or dose out	1
3-94-0214	4/15/81	- No time out or dose out	2

Response

To stress the radiation work permit requirements on an individual level, the workers have been identified and will be counseled as to the importance of strict adherence to Health Physics Regulations. It is pertinent to note that although these individuals failed to record exposure received on these Radiation Work Permits, personal dosimetry which is tabulated daily would have detected any abnormally high dosage.

The areas involved subjected the individuals to very low levels of radiation. Due to the above and the small number of deviations (8 out of approximately 1800 entries) which occurred on the three Radiation Work Permits identified above during the Refuel Outage consequences are minimal. Philadelphia Electric Company's General Employee Training adequately addresses personnel requirements for radiation work permits. These requirements have been further stressed in the nuclear plant rules and regulations which were discussed with PECO employees in late 1980 and early 1981 and are distributed to others upon initial unescorted access to the protected area.

2. Health Physics Operating Procedure HPO/CO-9A, Revision 5, "Respiratory Protection Training and Fitting", states in Section 1, "Personnel who may be expected to use respiratory protective equipment in the course of their duties at Peach Bottom and supervisors who direct

respirator wearers shall be trained in the proper use of such equipment."

Contrary to the above, as of April 16, 1981, the licensee's respiratory protective equipment training program did not provide training for personnel expected to use the breathing air (manifold) supply system, which was routinely used by workers.

Response

The Respiratory Training Program which is given to workers was revised and approved on April 28, 1981, to include the proper use and correct air pressure settings for the breathing air manifold supply system. Health Physics Operating Procedures have been revised to require that Health Physics technicians ensure setup of breathing air equipment and frequently verify that the conditions under which the equipment was setup have not changed. These actions should prevent recurrence.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. R. Keimig", followed by a large, stylized flourish or initial "P".

cc: Site Inspector
P.O. Box 399
Delta, PA 17314-0399

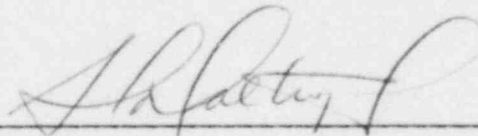
COMMONWEALTH OF PENNSYLVANIA :

SS.

COUNTY OF PHILADELPHIA :

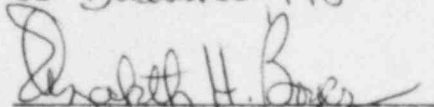
S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing response to Inspection Report No. 50-277/81-10 and 50-278/81-11, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



A handwritten signature in cursive script, appearing to read "S. L. Daltroff", is written over a horizontal line.

Subscribed and sworn to
before me this 7th day
of December 1981



A handwritten signature in cursive script, appearing to read "Elizabeth H. Boyer", is written over a horizontal line.

Notary Public

ELIZABETH H. BOYER

Notary Public, Phila., Phila. Co.

My Commission Expires Jan. 30, 1982

RECORDED
11/21/81