

December 21, 1981

Mr. Ronald C. Haynes, Regional Administrator  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406



Re: Docket No. 50-220  
File No. IAL-80-38

Dear Mr. Haynes

In accordance with Item 1 of the referenced Immediate Action Letter, we are hereby submitting an Action Plan Progress Report for the month of November, 1981.

1. Action Plan Section ID, Radiation Protection Organization:

As indicated in our monthly report for October (our letter of 11/19/81), Item 2, we have further evaluated the Clerical Staffing required to maintain Radiation Records. An additional (fifth) position has been authorized, and the individual designated will be assigned in January, 1982. This position will be primarily associated with record keeping requirements of the Respiratory Protection and ALARA programs, but will be cross-trained in routine dosimetry duties.

2. Action Plan Section IE, Training Department Staffing For HP

The Training Department staff has been increased to provide five personnel in the area of General Employee Training, which includes Radiation Protection and Emergency Plan training. This is in addition to the Radiation Protection Training Specialist, who will provide technician training with contracted assistance.

3. Action Plan Section II C 3, General Employee Training

Revisions to the Radiation Protection Training program designed to incorporate certain provisions of NUREG 0761, such as increased demonstration of the capability of individuals to perform required evolutions, are scheduled for March, 1982. The resulting increased initial training required for new workers will be balanced by a more efficient retraining program designed for experienced personnel.

Efforts to develop a "site specific" training program for nuclear workers previously trained at other sites will await the necessary input, through INPC or NRC, of approved common program elements which would not have to be

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repeated at each site. (The NRC could assist greatly in developing such a program if it would identify the training given to NRC personnel by submitting lesson plans and related documentation to licensees.)

4. Action Plan Section III A, External Exposure Control, Section III C 3, Respiratory Protection Program - Records, And Section IV C, ALARA Program Exposure Tracking

The schedule of installation for the new Stoller Security/Radiation Protection computer has been sufficiently defined to allow long range planning. It now appears that the system access control provisions will be operational by the beginning of 1983. Although it is possible to implement some dosimetry operations by that time, proximity to the next refuelling outage (March, 1983) makes it inadvisable to also attempt to fully convert the radiation records functions to the new system at that time. Consequently, a meeting was held 11/12/81 to investigate current computer program upgrading to be performed prior to the next outage, and to identify a conversion program to the new system, possibly retaining some capabilities of the existing system. A detailed project Work Request will be submitted in January, 1982.

5. Action Plan Section VI, Procedure Revision and Upgrade

Over 90 procedures have been written or revised in the first 11 months of 1981. Procedure S-RTP-57 for operation and calibration of the Eberline iodine, noble gas and particulate monitors was completed in November, as well as two chemistry procedures. Other procedures in draft or review stages are listed in Table 1, and indicate current departmental activity.

6. Contracted Technical Support

During 1981, we have made use of from one to five General Electric Health Physics personnel in upgrading the Radiation Protection program. Now that the majority of NMPC staff positions have been filled, we intend to discontinue the last of these support personnel prior to 12/25/81. We have on hand procedure and program drafts developed by the group which are to be approved and implemented by the appropriate supervisors. GE personnel will remain available for consultation or call-back on an "as required" basis.

7. Action Plan Open Items

The various Radiation Protection program Action Plan areas all have additional long-term improvements in progress, which will continue into 1982. We request relief from the current monthly reporting requirement of IAL-80-38, and propose to report on a quarterly basis instead, with the next report to be submitted in April, 1982, covering first quarter activities.

Page 3  
12/21/81  
IAL-80-38

Please contact Mr. E.W. Leach at the Nine Mile Point Nuclear Station  
for further information concerning any of the above items.

Sincerely

*T.J. Perkins for*

Thomas E. Lempges  
Vice President  
Nuclear Generation

TEL/ewl/jm  
Enclosure

TABLE I

New or Revised Procedures in Progress

S-RTP-55	Operation and Calibration of the Eberline Model HFM-3A Hand and Foot Monitor
S-RTP-56	Operation and Calibration of the Eberline Model 530 N Survey Meter
S-RTP-16	Operation and Calibration of the Teletector and Modified Stack High Range Teletector
S-RTP-17	Calibration and Operation of Beta-Gamma and Alpha Activity Monitor, Thyac III, Model 490
S-RTP-46	Calibration and Operation of the Vamp Area Monitor
V.A.-4	Calibration and Operation of the Model BC-4 Beta Counter
S-RTP-49	Operation and Calibration of the High Range Survey Meter Underwater Model (CPMU)
RP-5	Methodology of Radiation and Radioactive Contamination Control
RP-6	Packaging and Transportation of Radioactive Material
IV.A.1-N	Operation and Calibration of the Atomic Absorption/Flame Emission Spectrophotometer