

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

March 17, 1982

Docket Nos. 50-277
50-278

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Inspection
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of February 16, 1982, forwarded Inspection Report 50-278/81-07 covering the period of February 23-25 and March 16-18, 1981. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. The item was categorized as a Severity Level V violation and is restated below along with our response.

Technical Specification Section 6.11 states:

"Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

Procedure HPO/CO-10a requires that personnel in the controlled area always wear the provided personnel dosimetry...".

Contrary to the above, at about 1:06 PM on February 23, 1981, an individual, present in the controlled area, was not wearing the provided personnel dosimetry.

This is a Severity Level V Violation (Supplement IV).

RESPONSE

This violation is the result of an individual personnel error. On February 23, 1981, an electrician was working on an energized electrical compartment. To decrease the hazard of electrical shock, the worker removed his jacket with the personnel dosimetry attached and placed it nearby on the floor adjacent to the compartment. Although the worker's personnel dosimetry was not attached to his body, he was not working in a radiation area. The dose rates in the area where the compartment was located were known to be less than 2 mr/hr. Contamination and airborne radioactivity levels were such that the area did not require radiological controls.

Upon notification, the individual replaced the dosimetry on the trunk of his body. The individual's supervisor was notified and the individual was counseled on the importance of wearing personnel dosimetry. Additionally, similar personnel were instructed to wear personnel dosimetry at all times. These actions should prevent recurrence.

Very truly yours,

A handwritten signature in cursive script, appearing to read "S. H. Hattop", is written in dark ink.

COMMONWEALTH OF PENNSYLVANIA

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SS.

COUNTY OF PHILADELPHIA

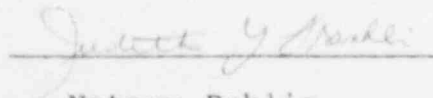
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S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing response to Inspection Report No. 50-278/81-07 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.



Subscribed and sworn to
before me this 17th day
of March, 1982.



Notary Public

Notary Public, Philadelphia, Pennsylvania

My Commission Expires July 28, 1983.