

30 October 1978  
3-0-3-a-2  
CS- 78-228

ATLANTA, GEORGIA

10/1 P2: 16

Mr. J. P. O'Reilly, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
101 Marietta St., Suite 3100  
Atlanta, GA 30303

Docket No. 50-302  
Licensee No. DPR-72  
Ref: RII:SCE  
50-302/78-22

Dear Mr. O'Reilly:

We offer the following responses to the apparent Items of Noncompliance in the referenced Inspection Report.

NOTICE OF VIOLATION

- A. 10 CFR 20.203(c) requires each high radiation area be conspicuously posted. 10 CFR 20.202(b)(3) defines a high radiation area to be any accessible area with radiation levels such that a major portion of the body could receive in any one hour a dose in excess of 100 millirem.

Contrary to the above, on September 6, 1978, an unposted area just inside the containment access hatch was found to have general area radiation levels ranging from 200 to 500 millirem per hour. The high radiation levels resulted from the temporary storage of several unlabelled 55 gallon drums containing contaminated materials.

- B. 10 CFR 20.203(b) requires each radiation area be conspicuously posted. 10 CFR 20.202(b)(2) defines a radiation area to be any accessible area with radiation levels such that a major portion of the body could receive, in any one hour, a dose in excess of 5 millirem.

Contrary to the above:

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1. On September 7, 1978, the access stairs to the decay heat pit was not posted as a radiation area. Surveys revealed general area radiation levels of 10 to 40 millirem per hour.
2. On September 7, 1978, an area near the waste drumming and solid waste storage area was not posted as a radiation area. Surveys revealed general area radiation levels of 1 to 30 millirem per hour. These radiation levels resulted from the storage of a number of unlabelled 55 gallon drums containing solid radioactive waste.

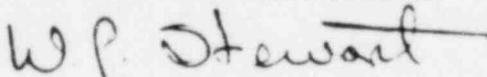
A&B Response: As indicated in the inspector's report, steps were immediately taken by the Chem/Rad personnel to bring the noted violations into full compliance with 10 CFR 20.203(b&c). Corrective steps taken to avoid further noncompliance are as follows:

- The Chem/Rad weekly survey schedule has been revised such that the areas surveyed have been divided equally over a four day period. This action ensures more thorough coverage for the surveyed areas.
- A special survey has been established to provide specific surveillance for posting of known radiation, high radiation, and contaminated areas once per week.
- A new set of requirements has been established to provide surveys of areas that have proven to be the most difficult to control, five times per week.
- A new log book has been established to better identify radiation, high radiation, and contaminated areas.
- A new technique has been established by which Chem/Rad personnel are assigned to cover work in Rad/Waste areas. This will assure closer detail to posting requirements.
- Training was completed 25 October 1978 to discuss this Notice of Violation and steps were taken to rectify and prevent recurrence.

If there are further questions, please contact us.

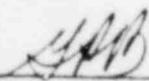
Very truly yours,

FLORIDA POWER CORPORATION



W. P. Stewart  
Director, Power Production

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Nuclear Plant Manager