

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

August 6, 1982

Mr. R. C. Haynes
Region I
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Haynes:

At our recent meeting, I discussed health physics concerns caused by an increase in employee procedural violations. I advised you that we had arranged for INPO to conduct a special assessment audit, so as to identify weaknesses and make recommendations for improvements. At that time, we briefly reported on INPO's preliminary comments, and I promised to forward a copy of INPO's recommendations when they became available. Attached is a copy of INPO's recommendations.

INPO's audit was conducted by specialists from their Radiological Protection and Chemistry Department. Their report was made, in person, by the Director and his assistant. INPO met with Philadelphia Electric on July 29, to discuss in detail their findings and recommendations. We are actively working to implement these recommendations. Also, I wish to advise that we have taken extraordinary steps to improve our operation based on comments made in your report dated July 13, 1982, as well as comments made at our meeting of July 22.

I have directed that your Site Inspector be appraised of our program and kept fully informed of our progress.

Very truly yours,



Attachment

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Problem: A number of radiological protection problems which appear to have the potential to cause more serious problems.

Basic Cause I: worker compliance

Recommendations:

1. Provide visible management support of radiological protection program to all workers.
 - a. Increase degree of disciplinary action for radiological protection violations.
 - b. Hold accountable first line supervisors of workers who violate radiological protection requirements.
 - c. Senior management conduct meeting with workers to announce support of radiological protection and new disciplinary program.
 - d. Ensure consistency and impartiality of disciplinary program between contractors and utility personnel.
2. Implement use of a single general radiation work permit for routine surveillance performed by plant personnel in place of multiple radiation work permits. This will probably necessitate clean-up of some areas.
3. Permit only designated senior radiological protection supervisors to orally reduce RWP requirements.
4. Place friskers near exits of contaminated areas with posted instructions for use. This may necessitate use of shielded booths to reduce radiation background.
5. Additional emphasis should be placed on improved housekeeping in all utility power plants.

Basic Cause II: Health Physics Department

Recommendations:

1. Increase the number of first line supervisors in health physics department.
2. Improve internal communications by implementing the following:
 - a. meetings during outages to point out problems and procedure changes to technicians
 - b. frequent (daily) interaction among group leaders (level below Senior Engineer, Health Physics and Chemistry)

3. Improve communications between departments.
 - a. Department Managers discuss problems with counterparts.
 - b. Form plant ALARA committee.
4. Ensure consistency of technician assignment to specific jobs on a day-to-day basis.
5. Provide Department Managers with trend information on radiological protection problems.

Basic Cause III: Interface between plant and corporate health physics management

Recommendations:

1. Clearly define responsibilities and authority of Senior Engineer, Health Physics and Chemistry. Ensure he has sufficient authority to develop and improve station radiological protection procedures.
2. Clearly define responsibilities and authority of Corporate Director of Health Physics. Corporate office should provide only broad policy guidance.
3. The Corporate Director of Health Physics should monitor and trend plant performance in areas such as incidents, liquid and solid waste volumes, and collective personnel exposure. Goals should be established; reasons for undesirable trends should be determined; and commitments for station corrective action should be obtained.
4. Ensure station management interviews prospective employees. Station management should understand the authority they have to accept or reject personnel after corporate screening.

Basic Cause IV: general employee training programs

Recommendations:

1. Expand initial general employee training to include a demonstration by each trainee that he can perform practical ability demonstrations.
2. Stress importance of worker compliance with radiological protection requirements.
3. Upgrade written examination.
4. Include training on recent plant radiological protection problems.

Basic Cause V: Radiological protection technician training program

Recommendations:

1. Provide radiological protection technicians training on actions to be taken in unusual situations.
2. Provide training on recent plant radiological protection problems.
3. Implement retraining program for all radiological protection technicians.
4. Provide an instructor to facilitate on-the-job training sign-offs.

Basic Cause VI: quality assistance program

Recommendation:

Broaden evaluation of quality assistance audits to include identification of generic problems in radiological protection. Ensure symptoms of generic problems are not easily closed out.