U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-247/82-21

Docket No. 50-247

License No. DPR-26 Priority -- Category C

Licensee: Consolidated Edison Company
of New York, Inc.
4 Irving Place
New York, New York 10003

Facility Name: Indian Point Station, Unit 2

Inspection At: Buchanan, New York

Inspection Conducted: October 18 - 22, 1982

Inspectors: _____ 12/16/82
D. J. Collins, Radiation Specialist date
Facilities Radiation Protection Section

_____ 12/16/82
C. A. Rowe, Radiation Specialist date
Facilities Radiation Protection Section

Approved by: _____ 12/16/82
M. M. Shanbaky, Chief, Facilities date
Radiation Protection Section, Radiological
Protection Branch, DETP

Inspection Summary:
Inspection on October 18 - 22, 1982 (Inspection Report Report No. 50-247/82-21).

Areas Inspected: Routine, unannounced safety inspection of the radiation protection program including: respiratory protection; dosimetry; field operations; ALARA activities; previously identified items; and whole body counting. The inspection involved 107 inspector-hours onsite by two region-based inspectors.

Results: No violations were identified.

DETAILS

1. Persons Contacted

1.1 Indian Point Station

*M. Blatt, Acting Director, Regulatory Affairs
J. P. Cullen, Radiation Protection Manager
P. J. Gaudio, Dosimetry
*R. D. Gauny, Deputy General Manager, Environmental Health & Safety
*W. E. Graber, Acting General Manager, EH&S
E. Imbimbo, Training Instructor
*C. W. Jackson, Vice President, Nuclear Power
R. Keel, Radiological Engineering, EH&S
M. O'Kelley, Radwaste Manager, EH&S
G. C. Re', Nuclear Environmental Monitoring Manager, EH&S
M. Shannon, Nuclear Environmental Monitoring
C. Stajura, Nuclear Environmental Monitoring
F. Wolfe, Health Physics

1.2 USNRC

*T. Foley, Senior Resident Inspector
P. Koltay, Resident Inspector
T. Rebelowski, Senior Resident Inspector

*Attended exit interview on October 22, 1982.

2. Licensee actions on previously identified items

2.1 (Closed) Information Notice 82-36 (82-IN-36): Respirator users warning for certain 5-minute emergency escape self-contained breathing apparatus. The Information Notice, dated September 2, 1982, gives recommended actions to be taken by owners of specific units with potential failure modes. A licensee memo dated October 19, 1982, reports that the units are not used at Indian Point Station.

2.2 (Closed) Violation (81-20-06): Failure to adhere to procedures. Inspector review of Radwaste Instruction No. 9.30, Revision 3, September 20, 1982, indicates that the required information is contained therein with the appropriate signatures required. The actions are acceptable and are in accord with the licensee's letter to NRC Region I dated December 18, 1981.

3. Radiological Engineering

The Radiological Engineering group was formed in September 1982, as part of the Environmental Health & Safety Department, to provide radiological engineering and ALARA (as low as reasonably achievable) support for the station. Engineering staff is onsite round-the-clock for this outage.

The estimated man-rem radiation exposure for the outage is 1383 man-rem. Higher than expected radiation levels in and around the steam generators were found at the start of the outage. Evaluation of these levels has resulted in some curtailment of scheduled jobs, and postponement of other jobs.

An internal memorandum dated October 7, 1982, and interviews with dosimetry and radiological engineering management and staff, indicate that a computerized dosimetry program is being modified to permit exposure tracking by work group, job number and overall task. The modified computer code will permit tracking to include the percentage of estimated versus actual exposures received. The reports will be available to Health Physics and other management personnel. A summary report to include jobs performed, exposure received, fraction of estimated dose, actual exposure, and jobs deleted or modified, is expected at the completion of the outage.

The Manager, Radiological Engineering stated that staff directions are to ensure that available contamination controls are used, exposures minimized and added emphasis placed on engineering controls to enable personnel to work without respiratory protection.

4. Posting, Labeling and Controls

The inspector toured the Primary/Auxiliary Buildings, Unit 2 vapor containment, Unit 1 Radwaste building, Maintenance and Outage Building, Contaminated Laundry and Respiratory Cleaning trailers and plant yard, and conducted independent radiation surveys to determine compliance with 10 CFR Part 20, 10 CFR Part 19, and licensee procedures for posting and control of radiation areas, high radiation areas, contaminated areas and control of contaminated materials and packages.

No violations were identified.

5. Radiological Surveys and Radiation Work Permits/Authorizations

The inspector selectively reviewed the records of radiation, contamination and airborne radioactivity surveys which had been performed between August 1, 1982 and October 22, 1982. Included in the review were steam generator primary and secondary side surveys.

No violations were identified.

6. Radiological Procedures

The inspector reviewed recently revised procedures to verify that the changes were properly made and consistent with the regulations in 10 CFR Parts 19 and 20, Licensee Technical Specifications, Procedures, and acceptable Health Physics practices. Procedures associated with the

Nuclear Environmental Monitoring Radiation Protection and Radwaste Departments were reviewed. Review of Radiological Engineering Department procedures was not conducted.

No violations were identified.

7. Administrative Controls

7.1 Staffing

An internal memorandum dated October 11, 1982 indicates that the Environmental Health & Safety department management will change, by November, 1982, from a contractor individual to a licensee manager. The qualifications of the individual exceeds the recommendations of Regulatory Guide 1.8, Revision 1-R, September 1975, for a Radiation Protection Manager.

7.2 Audits

A contractor performance audit team is onsite 24 hours per day to audit radiation worker compliance with station procedures and RWPs; audit Health Physics technician performance; and observe and report on conditions as related to radiological safety. The audit team maintains records and also investigates radiological infractions such as higher than expected exposures, high exposures and off-scale dosimeters. The individuals comprising the team meet the recommendations for supervisors contained in ANSI-N18.1-1971. The team reports to licensee management and is scheduled to be onsite until the end of the outage.

7.3 Staff Qualifications

Licensee staff for the outage include 91 contractor personnel (40 junior technicians, 40 ANSI qualified senior technicians, 4 ANSI qualified supervisors, 4 clerical personnel and 3 auditors). Training records review and interviews with 15 technicians indicated that appropriate training and familiarization were carried out prior to plant assignment. Licensee personnel in radiation protection include the manager, 4 qualified supervisors, 5 qualified senior technicians, and 6 junior technicians in various stages of qualifications. No individuals were observed to be functioning in a position they were not qualified for.

No violations were identified.

8. Respiratory Protection

The inspector audited respiratory protection training provided at the station. Also reviewed were the respirator fit testing facility, the whole body counter and qualification records for individuals. Procedures lesson plans and test results were reviewed. The procedures, facilities, and training and qualification records were found to be adequate. A temporary respirator cleaning and repair facility is in operation. A permanent facility is being completed.

No violations were identified.

9. Radiological Worker Training

The inspector reviewed lesson plans, tests, testing results to determine compliance with 10 CFR 19 and 10 CFR 20. The records of 40 individuals were examined.

No violations were identified.

10. Exit Interview

A meeting was held with licensee management on October 22, 1982 (attendees noted in paragraph 1). The inspectors summarized the scope and findings of the inspection.