

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



CORBIN A. McNEILL, JR.
Resident Manager

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September 17, 1982
SERIAL: JAFP 82-0981

United States
Nuclear Regulatory Commission
Region 1
631 Park Avenue
King Of Prussia, PA 19406

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Attention: Thomas T. Martin, Director
Division of Engineering
and Technical Programs

SUBJECT: NRC INSPECTION NO. 50-333/82-13

With reference to the routine inspection conducted by Mr. C. Hosey and Dr. M. McBride of your office on June 14-18, 1982 at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated August 18, 1982 as received by the undersigned on August 23, 1982.

APPENDIX A

NOTICE OF VIOLATION

As a result of the inspection conducted on June 14-18, 1982, and in accordance with the NRC Enforcement Policy, 10 CFR 2 Appendix C (47 FR 9987 March 9, 1982), the following violations were identified:

- A.1. 10 CFR 20.103(b)(1) requires each licensee to use process or other engineering controls, to the extent practicable, to limit concentrations of airborne radioactive materials in an area to levels below 25 percent of the amounts specified in 10 CFR 20 Appendix B, Table I, Column I, when averaged over the number of hours in any week during which individuals are in the area.

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Contrary to the above, on November 1, 1981, process and engineering controls were not used to the extent practicable during work controlled by Radiation Work Permit No. 4883(s) in that an auxiliary ventilation filter unit was installed, but not properly operated during approximately 60 percent of the job. This resulted in an average concentration of radioactive material of more than one hundred times the amounts specified in 10 CFR 20 Appendix B, Table I, Column I, when averaged over the number of hours in the week when individuals were in the area.

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

- A.2 10 CFR 20.201(b)(2) requires each licensee to make such surveys as are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10 CFR 20.201(a) defines survey as an evaluation of radiation hazards, including measurement of concentrations of radioactive material.

Contrary to the above, on December 28, 1981, workers were required to use respiratory protective equipment due to the expected presence of airborne radioactive material on a job covered by Radiation Work Permit No. 8824(s), but no measurement of the concentration of airborne radioactivity was made, as was reasonable under the circumstances, to evaluate the extent of radiation hazard from airborne radioactivity.

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

- A.3 10 CFR 20.203(e)(1) requires that any area where any radioactive material (other than natural uranium or thorium) is stored in quantities greater than 10 times the amount specified in 10 CFR 20 Appendix C be posted with a sign or signs bearing the radiation caution symbol and the words: Caution (or Danger), Radioactive Material(s).

Contrary to the above, on June 16, 1982, an unposted area adjacent to the building housing Auxiliary Boiler "C" was used to store boxes (labeled condenser tubes) which contained radioactive material in quantities greater than 10 times the amount specified in 10 CFR 20 Appendix C.

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

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RESPONSE TO
NOTICE OF VIOLATION

A.1 The Power Authority agrees with this finding. Factors contributing to this incident were:

1. Lack of familiarity with the use of engineering controls on the part of the workers.
2. Failure to specify on the radiation work permit (RWP) instructions requiring the use of the established engineering controls.

Immediate corrective actions taken upon discovery of the situation were:

1. Work was halted.
2. Whole body counts for workers were taken. No adverse results were observed.
3. MPC hours were calculated and recorded. The maximum MPC hours calculated were 6.18.
4. Individuals involved were briefed in the use of ventilation.
5. Follow-up air samples were taken prior to restarting the job.

Long term corrective actions that have been taken to prevent a recurrence have been the institution of RPOP-4 ALARA Review which provides formal guidance in the use of engineering controls and the institution of a check sheet which indicates the prescribed exposure reduction and contamination control technique to be used on jobs.

In addition to the above, we will take the necessary action to insure all leadmen are instructed as to their responsibilities in the use of engineering controls. This will be completed by October 14, 1982.

- A.2 The Power Authority does not agree with this finding. A survey was performed in the drywell to assess the radiological conditions and necessary protection prior to issuing Radiation Work Permit No. 8824(s). Along with establishing exposure rates, disc smears were taken to determine smearable contamination levels. Smearable contamination levels in conjunction with the type work to be performed is used as a guide to establish required protective equipment. In this case smearable contamination levels for the snubbers ranged from ~8,000 to ~30,000 dpm/100 cm². Based upon the Radiation Protection Procedures Table 3.5-1 "Respiratory Protective Clothing Requirement Guide", coveralls, rubber and cloth shoe covers, cotton gloves and cotton cap were recommended. Respiratory protection was not recommended in this instance.

However, because this work was to be conducted in the drywell, full face particulate filters were required as a precaution to workers from potentially higher than ambient radioactive airborne levels resulting from work in adjacent areas. Three ambient air samples taken in the general work area covered by this RWP verified that the protection factor for this job was not exceeded. One was a 24 hour sample which spanned the work time in question. The other two were samples in the general area before and after. The maximum effective MPC was 0.73 and maximum work time on this RWP was 2 hours and 5 minutes.

Because of the extent of snubber inspections in the drywell it would have been impractical and contrary to good ALARA work practices to perform individual air sample surveys for each removal and reinstallation. It is considered that the surveys taken in this case were reasonable under the circumstance to evaluate the extent of radiation hazards that might be present.

- A.3 The Power Authority agrees with this finding. This violation was caused by lack of formal procedures for the temporary storage of radioactive material outside of the radiologically controlled areas of the plant. The boxes of slightly contaminated condenser tubes were labeled with tags containing the radiation caution symbol and words: Caution Radioactive Material. However the storage area was not posted as required by 10 CFR 20, Appendix C.

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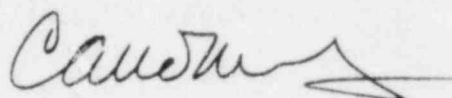
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Immediate corrective action was taken by roping and posting the area with appropriate signs.

Long term corrective action will consist of the development of a procedure for temporary storage of radioactive material outside of the confines of the radiologically controlled area and training of plant personnel in this procedure.

Full compliance will be achieved by October 30, 1982.

Very truly yours,



CORBIN A. McNEILL, JR.
RESIDENT MANAGER

CAM:EAM:jaa

CC: Leroy W. Sinclair, PASNY, WPO
J. P. Bayne/PASNY, WPO
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E. Mulcahey/PASNY, JAF
NRC Resident Inspector
NRCI File
Document Control Center

Subscribed and Sworn
to before me this
17th day of September, 1982



Notary Public

BEVERLY R. PRUCNAL, #4628499

Notary Public - State of New York

Appointed in Oswego County

My Commission Expires March 30, 1984