

MAR 05 1986

MEMORANDUM FOR: S. J. Collins, Chief, Projects Branch No. 2, DRP
FROM: R. R. Bellamy, Chief, EP&RPB, DRSS
SUBJECT: RADIOLOGICAL CONTROLS SALP INPUT - NINE MILE POINT 2

The radiological controls SALP input for Nine Mile Point 2 is attached.
The SALP covers the period February 1, 1985 - January 31, 1986.

Original Signatures

Ronald R. Bellamy

Ronald R. Bellamy, Chief
Emergency Preparedness and
Radiological Protection Branch
Division of Radiation Safety
and Safeguards

Attachment: As stated

cc w/attachment:
R. Starostecki
T. Martin
W. Pasciak
M. Shanbaky
J. Linville
R. Gramm
S. Hudson
R. Nimitz
SALP Notebook

RN
RN:DRSS
Nimitz/lp
3/5/86

WP
RN:DRSS
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3/5/86

RRB
RN:DRSS
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3/5/86

F/25

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Attachment

Radiological Controls SALP Input

Nine Mile Point 2

There were four inspections conducted by radiation specialists this assessment period. Three of the inspections were routine and examined the licensee's radiation protection program, radioactive waste management program, preoperational testing of solid, liquid and gaseous waste processing systems, and testing of process, effluent and area radiation monitoring systems. The fourth inspection was a special inspection to review the circumstances, licensee evaluation, and corrective action following identification of an apparent leaking radioactive source.

The Radiological Control Program at the Nine Mile Point Station (Unit 1 and Unit 2) will be common to both operating units and will be conducted under the same management supervision. The licensee is currently reviewing and revising (as appropriate) the program elements at Unit 1 for use at Unit 2.

A limited review, consistent with facility and program completion, was conducted of this area last assessment period. The licensee's program in this area was categorized as Category 1. The previous review focused on review of organization development and ALARA review of the plant's design. One concern involving the need to approve newly developed supervisory job descriptions was identified. The job descriptions have yet to be subsequently approved.

The organization and staffing of the radiological control organization was reviewed. The licensee has established an adequate, clearly defined organization to support routine operation of Unit 2. With the exception of a new dosimetry supervisory position, position responsibilities and authorities are clearly defined. The staffing level is adequate to support fuel load of Unit 2. The licensee will augment his staff with qualified contractors to assist in startup activities such as shield surveys and water chemistry testing. The licensee is aggressively recruiting to fill identified permanent positions in the chemistry group. These positions are needed to support dual unit, full power operation.

The licensee has reviewed the organization and staffing needs to support the upcoming combined Unit 2 activities and outage activities at Unit 1. Draft organization and staffing levels were established. The licensee will ensure that adequate numbers of trained and qualified radiological controls personnel are available to support these dual unit activities. The licensee should finalize his organization and staffing levels to ensure adequate time for training and qualifying of personnel brought on board to augment the organization.

Review of licensee training of personnel associated with fuel receipt activities found that acceptable radiological controls training of personnel associated with these activities was provided. No deficiencies or unacceptable conditions were identified. Reviews of the licensee's current program for training, qualifying and retraining radiological control personnel for routine operation found that the program was lacking and not well defined. It was found that adequate methods were not in place to train personnel in new procedures and procedure changes in a timely manner, the licensee had not clearly identified the minimum tasks an individual must be qualified for, based on his scope of responsibilities. The retraining/requalification frequency for radiation protection and chemistry personnel has not been established, and the minimum material an individual should be retrained and requalified in following initial training and qualification was not clearly defined. The licensee subsequently established a program to train personnel in safety significant procedures and procedure changes in a timely manner but failed to establish a mechanism to evaluate its effectiveness. Although licensee personnel are addressing these matters, additional management attention should be directed to the area to ensure an adequate and effective radiological controls personnel training qualification and retraining program is established.

Reviews of the training, qualifications, and retraining program for Radioactive Waste Operations personnel found that a program to address these matters at Unit 2 has not yet been established. The licensee is currently establishing the program in this area for Unit 2. The licensee's plans in this area will provide for a comprehensive technically sound program.

The licensee performed a review of the General Employee Training (GET) program to determine its adequacy for use at Unit 2. The licensee is revising the program to address minor changes to accommodate Unit 2. The licensee's actions on this matter should provide for an acceptable Unit 2 GET program.

Review of the training and qualification of startup personnel in this area identified problems in that incomplete and unavailable records precluded NRC determination of the adequacy of the training and qualification of these personnel. Documentation of the acceptability of the architect engineers (AEs) training program for startup personnel was not available nor were all resumes of personnel readily available for review. When brought to the licensee's attention, the licensee performed a timely, comprehensive audit of the acceptability of the training, qualification, and experience of startup personnel. No significant deficiencies were identified. The licensee documented the review of the acceptability of the AEs training program and located the resumes of all individuals.

The review of the licensee's overall progress in establishing and implementing a radiological controls program for Unit 2 found that the licensee is establishing and implementing all program areas in a timely manner to support fuel load and other Unit 2 milestones. These programs are primarily Unit 1 programs approved for use in Unit 2. Special program procedures (e.g., high radiation area access control, and surveys) are being separately developed for Unit 2. The majority of these program procedures have been approved for use

in Unit 2. No deficiencies were identified. The licensee is acting in a timely manner to ensure all appropriate program elements and associated procedures are in place to support appropriate plant milestones.

The licensee is currently developing his radiation shield survey program. The licensee has contacted other utilities and obtained procedures and other information to assist them in developing his program. The licensee's efforts in this area are indicative of an attention to detail in the program development. One deficiency relating to establishment of adequate administrative controls to ensure resolution of out of specification survey data was identified. The licensee addressed this issue in a timely manner.

The licensee has not yet commenced testing the major portions of his solid, liquid and gaseous waste processing systems. However, review indicates a comprehensive program in this area is to be established. The licensee is paying particular attention to the processing capabilities of his solid waste processing system to ensure it will provide a solidified product capable of meeting burial site requirements. The licensee's efforts in this area should ensure compliance with burial site requirements. The licensee's effort in this area is indicative of attention to detail.

Walkdowns of the solid and liquid waste processing systems and safety related ventilation filter trains did not identify any deficiencies. The installed systems were consistent with FSAR descriptions.

The licensee has installed a state-of-the-art radioactive waste control room. The control room provides for manual and computer controlled solid and liquid waste processing.

The licensee has installed a separate decontamination bridge and associated equipment for decontaminating the reactor cavity. This, in conjunction with licensee efforts to polish the reactor cavity walls, are clear indications of management's efforts to minimize exposure during refueling operations and maintain exposure ALARA over the life of the plant.

Regarding new fuel receipt and inspection activities, the licensee performed acceptable preplanning for these activities. Defined procedures for control of the activities were established. Observation of fuel receipt and handling activities, however, identified several deficiencies requiring licensee attention. These deficiencies involved proper evaluation of smear sample results and proper completion of smear counting instrument control charts. The licensee initiated timely action to evaluate and correct these matters.

The results of the special inspection of the identification of an apparent leaking alpha source indicated the licensee addressed this matter in a timely, generally technically sound manner. The licensee's reviews were comprehensive and determined the problem was due to radon and not a leaking source.

Review of licensee action on bulletins, circulars, and generic letters in this area found that the licensee's efforts were not well coordinated and timely, the action taken was not comprehensive, and that action previously taken was not reviewed to determine if it was still adequate considering changes to plant systems. In some cases, the licensee ceased action on some circulars based on NRC acknowledgement that the licensee has received the circulars and plans to incorporate guidance contained in the circular into appropriate operations procedures and facility training programs. This problem is particularly evident in licensee actions to prevent, detect, and control cross contamination between radioactive and non-radioactive systems and resultant personnel exposures or unmonitored releases. This is also evident in licensee programs to control on site storage of radioactive material. The above demonstrates a less than acceptable response to NRC initiatives relative to control of radioactive material. The licensee has initiated action to address these matters prior to fuel load and other appropriate milestones.

Conclusion

Category 2

Board Recommendation

- Licensee - Implement requirements and guidance contained in bulletins, circulars, and information notices. Assure that a coordinated program exists to properly review and resolve matters discussed in bulletins, circulars, and information notices.
- Approve job position descriptions.
- NRC - Continue current inspection effort in this area.