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October 13, 1982

ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Docket Nos. 50-317  
50-318  
License Nos. DPR-53  
DPR-69

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

Gentlemen:

This refers to your Inspection Report 50-317/82-06; 50-318/82-06, which transmitted three items of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to those items noted in your letter of September 17, 1982.

Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,

Vice President - Supply

AEL/DWL/gla

Enclosure

cc: J. A. Biddison, Esquire  
G. F. Trowbridge, Esquire  
D. H. Jaffe, NRC  
R. E. Architzel, NRC

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT NO. 50-317/82-06; 50-318/82-06

As a result of the two incidents identified in A.1, A.2, and A.3, the Radiological Controls Unit requires the exclusive use of Special Work Permits (SWPs) for any maintenance work in the Spent Fuel Pool (SFP) regardless of the work scope. Any such work is continuously monitored by a Health Physics Technician who is available to observe work evolutions, perform appropriate surveys, control personnel exposures, and advise and/or instruct workers regarding radiation protection practices consistent with potential radiological hazards. Appropriate warning signs have been posted in SFP areas to remind workers that a Health Physics Technician is required prior to starting work. Compliance with respect to surveys and proper use of Radiation Work Permit program was achieved in November 1981.

A new detailed work procedure, RV-68, "Incore Instrument Removal," was issued on May 5, 1982, to provide for worker briefings, Special Work Permit usage, ALARA reviews, added radiological precautions, and appropriate hold-points for the notification of the Radiological Controls Unit concerning the intent to work and/or change work scope. With proper notification, the Health Physics Technician will perform appropriate surveys. Compliance was achieved in May 1982.