GEORGIA POMER COMPANY HATCH MUCHEAR PLANT PROCEDURE

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	HNP-30 PROCEDURE			
RE	SPONSIBLE	SECTION		
AFETY RELATED (Y		NON-SAFETY	DEL ATEN	

REV.	DESCRIPTION.	APPROVED DEPT. HEAD	APPROVED PLANT MANAGER	DATE
13	General	WH Roger	Day Drew for	2/10/02
14	Pages 1-9,//15 & 17	WH Roger	Harry Ry	10/28/52
15	Pages 2-5, & 7	WATTER gan	Harvey Plix	2/28/33
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PROCEDURE REVISION REQUISE

PROCEDURE NO. HMP- 8008

REVESTED_RY	DEPARTMENT HEAD ASSYDUAL	
Name: Date:	Signature: Date:	
Beb Fallier 11-9-82	WA Rogen 11-18-	23
REVISION CHANGES MODE OF OPERATION () Yes	OR INTENT AS DESCRISED IN FSAR:	
CHANGE INVOLVES:		
() An unreviewed Safety Question (See back for Safety Evaluation	() Tech.Specs. (\(\simega \) Neither on if required).	
Safety Related (Non-Safe	ty Related ()	
Safety/Non-safety Status Change (Yes () No	
Attach marked up copy or procedure		
REASON FOR REGIEST Section D.S.	to eliminate unnecessary	
ALARA VEVEIUS for RIVE AV		Liv.
are sufficiently addiessed	1 by ENP requirements.	
Section 6.4, to breaden	area of responsibility.	
Change "Shift Foreman" on pg. 2, para D. 2 ° pg pg. 4. para D. 8 ° pg 7 p	To thilf Supervisor	/"
on pg, 2 para D. 2 " Pa	13 para D.6 & D.8;	
pg 4 pan D.8. pg 7 p	pan I, 1;	
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PRR RECEMBLES APPROVAL: (V) Yes (Mo Star Spore	
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SAFETY EVALUATION

The revision of this procedure does not constitute an unreviewed : ifety	((
question as explained below.	
1. The probability of occurrence and the consequences of an accident	
or malfunction of equipment important to safety are not increased	
above those analyzed in the FSAR due to these chances because	
the revision does not change the purpose or performance of the	
system.	
2. The possibility of an accident or malfunction of a different type	
than analyzed in the FSAR does not result from this change because	
the system resconds and is operated as before the change.	
3. The marcin of safety as defined in the Technical Specifications	
is not reduced due to this revision because the revision does not	6
change any limited safe system settings which would allow a	
safety limit to be exceeded or to allow a limiting condition for	
operations to be exceeded as stated in Technical Specifications.	
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RADIATION WORK PERMIT

A. PURPOSE

To provide instructions for the issuance of and implementation of Radiation Work Permits (RWP).

The Radiation Work Permit procedure is designed to provide a capability to control and minimize radiation exposure that is received from work performed in radiation areas, high radiation areas, contaminated areas, and airborne radioactivity areas.

B. REFERENCES

- 1. 10 CFR 20
- 2. Reg. Guide 1.16

C. CONDITIONS REQUIRING RADIATION WORK PERMITS

- Entry into a High Radiation Area, Airborne Radioactivity Area, (as required by Health Physics), or any area posted with a "KEEP OUT - Radiation Work Permit Required" sign.
- 2. Entry to the drywell.
- 3. Maintenance or inspection of contaminated or radioactive equipment in excess of the following limits:
 - a. Smearable contamination in excess of 1000 dpm/100 cm2 beta-gamma.

NOTE

THE HEALTH PHYSICS SUPERVISOR OR DESIGNATED ALTERNATE MAY DETERMINE THAT A R.W.P. IS NOT NECESSARY TO DO INSPECTION OR MAINTENANCE ON EQUIPMENT WITH CONTAMINATION LEVELS IN EXCESS OF 1000 DPM/100 CM ² IF THE JOB IS OF A NATURE THAT CAUSES NO MEASURABLE CONTAMINATION TO THE INDIVIDUALS PERFORMING THE JOB.

- b. Radiation levels at 18 inches in excess of 100 mR/hr or where a whole body exposure of 100 mR/hr is likely.
- 4. Entry into areas with measurable neutron exposure.
- 5. Entry into an area of unknown condition.
- 6. Breaching of contaminated or potentially contaminated system.

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D. ISSUANCE OF THE RWP (Refer To Figure 1)

- 1. A supervisor responsible for work requiring an RWP should originate the permit. The originator should enter the date, location, Unit number, job description, and names of personnel expected to require access to the controlled area. He should provide an estimation of man hours required for work in the controlled area and enter his signature in the Requested By section. The RWP should then be forwarded to the Health Physics Supervisor or his designated alternate.
- 2. The Health Physics Supervisor or his alternate will review the work to be performed for any conditions which may adversely affect the safety of the plant or personnel involved. He will log the required information into the Radiation Work Permit Log Book and enter the permit number from the log book on the RWP. He will determine the appropriate work category using Section K and check off the appropriate block on the RWP.

NOTE

The Radiation Work Permit Log Book is a notebook kept in the Health Physics office and contains Form 3, Radiation Work Permit Log.

The Shift Ecreman may complete the RWP for Health Physics provided the following criteria are met:

- A qualified member of the Health Physics staff is not on site, AND
- b. The safety of the plant warrants immediate action which would preclude calling in a Health Physics staff member from off site, OR
- c. Authorization is received from the Health Physics Supervisor or his designated alternate.
- 3. The RWP should be reviewed by the Health Physics staff to determine appropriate actions and controls to be implemented to preclude exceeding exposure limits and to maintain exposures as low as is reasonably achievable (ALARA). The area should be adequately surveyed prior to entry or be surveyed at the time of entry, items of protective clothing required should be identified, the type of monitoring required should be specified and exposure records of personnel involved should be reviewed to assure exposures will remain ALARA and within permissible limits.

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- 4. Temporary shielding may be specified in order to reduce personnel exposure, to reduce background levels in frisking areas, or to bring radiations levels into compliance with plant and regulatory limits. This type of shielding should only be installed for specific time periods such as: for the duration of a job, until the next scheduled outage or as directed by plant management. Any shielding specification must be subjected to the applicable work controls and design reviews described in procedures HNP-8 Maintenance Request and HNP-809 Design Change Request.
- 5. The Health Physics Supervisor or designated alternate will review the RWP, enter the estimated man-rem, expiration date and time, sign the RWP for Health Physics approval, and remove the Health Physics copy for filing. The RWP is then forwarded to the Shift Foreman. A MAN-REM Estimate will as made cally for EWP's with with a area dose pates of NOTE and sports 2 100 Meet/hp

Estimated man-rem = Estimated man hours x average dose rate in rems

6. The Shift Foreman will review the RWP for any operations or conditions which may adversely affect the safety of the plant, enter the approved date and time, and sign the RWP. The Control Room copy of the RWP will be placed on file in the Control Room.

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Approval to start work will be in effect after the RWP is signed by Health Physics and Shift Foreman. See D.8 for exception.

- 7. The Supervisor requesting the RWP will review the RWP to familiarize himself with all requirements. The original RWP will then be taken to the jobsite and posted at the entrance to the jobsite on the clean side of the step-off pad. The supervisor should ensure that the workers have seen the RWP and are aware of its requirements.
- 8. In some situations where the plant needs immediate attention due to an emergency condition, a job may commence prior to the sign-off approvals of an R.W.P. by the Health Physics Supervisor or his designated alternate and the Shift Foreman. The approval to work, in these situations, will be contingent on the policy that a Health Physics person will accompany the workers, will perform the necessary radiation monitoring at the work place to protect the workers, and

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will give the workers proper instruction in radiation protection. The approval to work will also be contingent on the proper clearance and tagging of the effected equipment by the Shift Foreman and his staff.

E. ADDITION OF PERSONNEL NAMES TO RWP's

While an RWP is in force, the addition of names of personnel to the RWP may be made <u>only</u> on the approval by the Health Physics staff. The work assignment of the person being added <u>must be</u> directly related or associated with the job description on the RWP. When approval is granted, the person's name will be entered on the original RWP at the job site and on the Health Physics copy in the Health Physics Office.

F. PERSONNEL RESPONSIBILITIES

- 1. Supervisor responsible for work under RWP.
 - a. The supervisor is responsible for assuring that personnel working on the job know the protection requirements.
 - b. If Health Physics monitoring is specified on the RWP, the work supervisor will notify Health Physics Staff when the job is to start.
 - c. The individual shares a responsibility to promote an awareness of good ALARA practices.

2. Personnel performing work

- enter data on the RWP Time Record (Figure 2) or on the dosimeter sign in sheet (Form 1), or ensure that this data is entered on the right sign in sheet, (i.e. by H.P. tech.).
- b. Each person must be familiar with all requirements and instructions written on the RWP.

3. Health Physics Staff

- a. The Health Physics staff will provide radiation surveying and monitoring as required by the RWP.
- b. The Health Physics staff will assist the Supervisor-in-charge and personnel by providing guidance in radiation protection matters to minimize exposure.

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c. The Health Physics staff shares the responsibility to promote an awareness of good ALARA policies.

G. TERMINATION OF THE RWP

- When the job is to be terminated, the RWP with supplementary sheets attached, must be returned to the Health Physics Office by the Supervisor-in-charge of the work, or his alternate.
- 2. An RWP should be terminated for the following reasons:
 - a. Completion of the job.
 - b. Cancellation of the job or RWP.
 - c. Expiration of the RWP.
 - (1) Twenty-four hour limit.
 - (2) Time limit as noted on RWP.
 - Change in radiological conditions.

NOTE

No further work will be performed under the RWP once the permit is terminated or expired.

- 3. The Health Physics Supervisor or his alternate will mark the RWP as terminated by checking the appropriate reason for termination, entering the time and date of termination, and signing the RWP in the Terminated By section. He will then mark the time and date terminated in the Radiation Work Permit Log Book.
- 4. Prior to filing in documentation the original copy of the RWP, the Health Physics Supervisor (or alternate) should review the collective exposures associated with work in the controlled area. For jobs involving greater than 5 man-rem collective exposure, a copy of the RWP data should be forwarded to the Health Physicist or his designate for an ALARA program review. When the original copy of the RWP is filed, the Health Physics copy may then be removed and destroyed.

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H. ROUTINE RADIATION WORK PERMIT

- 1. Jobs that continue for more than 24 hours such as in outages, (i.e. turbine overhauls, etc.) a routine R.W.P. may be issued. Routine RWPs will only be issued to areas with constant H.P. coverage or an H.P. assigned to the control point unless approved so by an H.P. Supervisor or Foreman. Routine RWPs will have "Routine" written at the top and bottom to distinguish them from RWPs that expire after 24 hours. Routine RWPs will be terminated at the end of the month.
- 2. Routine R.W.P.s will be issued according to section D. except it will be stapled to a folder with dosimeter sign in sheets and a recent survey. Each dosimeter sign in sheet must have the R.W.P. number, date, and work category filled out.
- 3. When airborne conditions exist in the work area involving routine RWPs, the following additional steps will be taken for completion of Form 1-A. Air sampling program will be followed as per HNP-8013. Weighted MPC values will be calculated and proper action taken for personnel entries into airborne radioactivity areas. The action requirements for weighted MPC values designated below are as follows:
 - Less than 0.25 weighted MPC.
 No control of MPC-HR exposures required.
 - b. Greater than 0.25 weighted MPC but less than 1 MPC. Use respirators and limit exposure to airborne radiation as far as practicable or keep track of MPC-HRs in the following manner:
 - (1) Enter the result of the air sample analysis on the MPC-HR log sheet (Form 1A).
 - (2) For each entry calculate the total time in hours, for those individuals who did not receive any respiratory protection for either particulate or iodine or both.

MPC-HOUR = MPC fraction x Total time in Hours

c. Greater than 1 MPC-HR but less than 10 total MPC-HR must be restricted to 35 per week. All steps in 3.b must be followed.

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- d. MPC-HR values should be transferred to Form 5 of HNP-8010 from Form 1-A for each individual on a daily basis. A daily margin of MPC-HR should be supplied to the control point Health Physics technician, and he will use this to control stay time.
- 4. In areas where work continues 24 hours a day the routine R.W.P. will be left at the control point for the duration of the job. At the end of each shift change the dosimeter sign in sheets will be pulled and new ones attached. The completed dosimeter sign in sheets will be sent to dosimetry for dose recording.
- 5. The minimum survey frequency for routine R.W.P.s is every 24 hours. The H.P. Supervisor or Foreman will review all routine R.W.P.s and may set a more frequent survey requirement, according to radiological hazards associated with certain areas and the type of work being performed. Once the survey is performed and is written it is sent to the H.P. office for review and a copy is made. The copy is sent back to the control point to be attached to the routine RWP.

NOTE

If a routine R.W.P. is not used, a current radiation survey will not be updated and attached until the R.W.P. is put back into effect.

I. BLANKET RADIATION WORK PERMIT

- 1. For certain routine or repetitive work, a Radiation Work Permit Form may be issued to Operations, Health Physics and Radiochemistry groups, Plant Supervisors and designated inspection and surveillance groups, and marked BLANKET at the top and bottom of the form. The Blanket RWP must be approved by a Shift Foreman, the Health Physics Supervisor or designated alternate and an appropriate member of supervision of the group to perform the work. The Blanket RWP will be valid until cancelled by Health Physics or until the last Friday in each month.
- 2. The approved permit is stored in a protective holder in a book in the Health Physics Office. Exposure rates and a log of personnel doing the work are not entered on the Blanket RWP form. Such records are kept on Form 2, Blanket Radiation Permit Entry Log. After personnel complete work under the Blanket Permit, the information required on Form 2 MUST BE recorded.

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NOTE

Record information for each RWP area entered.

J. REGUIREMENTS FOR ENTRY INTO HIGH RADIATION AREAS

- All personnel entering a High Radiation Area where the field dose rate* is expected to be greater than 1000 mr/hr must obtain a high range dosimeter from the Health Physics Office before entry.
- 2. All personnel entering any High Radiation Area (greater than or equal to 100 mr/hr) must notify the Health Physics Office before entry. This applies both to regular RWP holders and Blanket RWP holders.
- 3. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
 - a. A radiation monitoring device which continuously indicates the radiation dose rates in the area.
 - b. A radiation monitoring device which continuously integrates the radiation dose in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
 - An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over activities within the areas and shall perform periodic radiation surveillance.
- 4. The purpose of these three options is to assure that adequate dosimetry is provided to assess radiation exposure, to assure that personnel entering these areas are properly informed as to the radiological conditions of the area, and to assure that the required equipment for entering has been provided.

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NOTE

*Field dose rate is referred to as the dose rate approximately 18 inches from a point or line source, or any area dose rate greater than 1000 mr/hr.

K. EXPOSURE CATEGORY DEFINITIONS (REG. GUIDE 1.16)

The following is to be used for determining the work category of the RWP.

Routine Surveillance and Inspection (RSI)

All inspections or surveillance that is continuous or repetitive in nature.

- Inspections of pumps, valves, systems, etc...
- b. Routine observations in Radiation Controlled Areas.
- c. Inspection of all mechanical or electrical components that does not involve physical work on that system.
- d. All Blanket RWPs except in the case of work involved on special categories, i.e. R.O., W.P., S.P.M., I.S.I., or R.P.M.
- 2. Routine Plant Maintenance (R.P.M.)

All plant maintenance that is routine in nature. This includes all maintenance that is performed or can be performed during normal plant operation.

- a. Repair of all valves.
- b. Repacking of valves.
- c. Rebuilding of pumps RWCU, FPCU, etc.
- d. Changing oil in system.
- e. Repair of electrical motors and components MOVs, Breakers, Motor Control Centers, etc.
- f. Changing of filters in HVAC filter trains.
- g. Greasing of pumps, valves, and motors.

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- h. Checking shaft voltage readings on components.
- i. Welding, grinding, lapping of components associated with systems.
- Special Plant Maintenance (S.P.M.)

Refers to special maintenance not usually performed during normal operations. Most major maintenance is associated with outages.

- a. Removal of feed water spargers.
- b. Radiographic examinations of all components.
- Repair of major steam supply delivery components -MSRs, MSSVs, MSIVs, SRVs, FWHs.
- d. Repair Turbine mechanical components Main Turbine and RFPTs.
- e. Removal and replacement of in-core monitors, TIPs, LPRMs, IRMs, SRMs, etc.
- f. Installation of new electrical systems or maintenance on those systems outage related - pulling cable, removal of insulation, etc.
- In RPV maintenance, i.e. Cladding Removal, Jet Pump Removal, etc.
- 4. Refueling Operations (R.O.)

All work performed that is directly related to the refueling done during a refueling and maintenance outage.

- a. Removal of RPV Head, Dryer Separator, Moisture Separator, Drywell Head, etc.
- b. Moving of new spent fuel from RPV to fuel pool or from fuel pool to RPV.
- c. Fuel Sipping.
- d. Gamma Scanning.
- e. Inspection of new fuel.
- f. Detensioning of RPV head.

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5. Waste Processing (W.P.)

All work that is associated with radioactive waste processing.

- a. Capping of drums in Radwaste drum capping room.
- b. Compacting of trash.
- c. Washing down of Drum Capping Rooms, Hopper Rooms, and Centrifuge Rooms.
- d. Radioactive Waste Shipments loading, surveying, and processing.
- e. Maintenance personnel removing and replacing lids on shipping casks or operating cherry pickers (cranes).
- 6. In Service Inspection (I.S.I.)

All work associated with inspection of Reactor Vessel, Steam Supply or Delivery components that has been in service. All non-destructive testing and/or inspection of components to determine quality of that component and/or system. Inspection of components that have been in service and preventive inspection of equipment that has been in service. Outage-related inspection of reactor vessel or associated components.

- a. Dye penetrant testing (PT).
- b. Ultrasonic testing (UT).
- c. Radiographic testing (RT).
- d. Magna Flux testing.

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FIGURE 1 RADIATION WORK PERMIT (FRONT SIDE)

		PL.	ANT E. I	HAT	MIT			RWP NO.
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EIGURE_2 RADIATION_WORK_PERMIT_(BACKSIDE)

Signature Indicates Understanding and Compliance (N - ME)	ALUGE NO.	TIME IN OUT NET	IN OUT	NET	IN	NET	IN OUT	NET	IN	NET	IN OUT	NET	TIM	NET	IN OUT	NET	TOTAL EXPOSURE (mrem)	TOTAL TIME (minute)
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FIGURE 3

	Peactor Operations Surveillance
a	Poutine Plant Maintenance
	Special Plant Maintenance Pofueling Operations
0	Waste Processing Inservice Inspection

FORM 1	
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FIGURE 4 FORM 1-A

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FIGURE 5

BLANKET RADIATION PERMIT ENTRY LOG

WORK CATEGORIES

Reactor Operations & Surveillance |
Routine Plant Maintenance &
Special Plant Maintenance &
Refueling Operations 4
Waste Processing 5
Inservice Inspection C

				WORK PERFORMED	TIME	1	REP DOSIMETER READING			
NAME	TLD NO.	DATE	AREA ENTERED	(Circle only one)	IN OUT	TOTAL	IN	OUT	TOTAL	
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FIGURE_6 FORM_3

PADIATION WORK PERMIT LOG

NIT NO. INSUED DATE TIME		HWP	REPLACES	HEALTH	RWP	300	REQUESTED	1	TERMINAT	CHTARIAN	
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