

August 24, 1979

Docket No. 50-320

NOTE TO: J. T. Collins
FROM: T. D. Murphy
SUBJECT: TMI RADIATION PROTECTION ORGANIZATION

As you requested on 8/15/79, I have reviewed the TMI Radiation Protection Organization submitted to B.H. Grier by Met-Ed/GPU on 8/13/79. I have the following comments.

1. I disagree with the concept of having the Sr. V.P.-Met-Ed as the only focal point for radiation protection activities and responsibilities. In my view, the radiation protection needs for this station are greater than for a normally operating station. The problems associated with worker safety are more complex technically and require a greater degree of management attention than we would expect at a normal operating reactor station. There should be one person answering to the Sr. V.P.-Met-Ed whose only responsibility is radiation protection and who is the focal point for the technical activities and management of the radiation protection function. As I have said before, this person should be a highly qualified radiation protection professional with proven management experience. Experience in spent fuel processing facilities or handling high levels of fission product contaminated liquids may be desirable. I personally don't think that either of the designated radiation protection supervisors have the technical and management background to adequately manage the radiation protection activities associated with the recovery of the TMI-2 reactor.
2. The supplied organization chart and associated explanation do not adequately indicate the complexity of the interactions between the group under Dubiel and the group under Linroth. For example, the Dosimetry and Respiratory Protection functions are integral and important aspects of the recovery function, yet they are under the Rad Prot. & Chem. supervisor, with only the Sr. V.P.-Met-Ed as the joint arbiter. I think this is unacceptable because it does not provide for timely resolution of technical/management problems at a level below top management. My advise for an acceptable organization would be to have such station-wide support activities under the one person I recommended above (see Fig. 1).

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3. In either the organization chart forwarded by Met-Ed/GPU or in a revised organization (as I recommend) the Chemistry function should be removed as a Radiation Protection function. Chemistry for this station is an extremely important function which deserves separate operational management. I personally would include the Radiochemistry and Chemical Engineer Support functions in this category. I also consider that the span of control as presently proposed by Met-Ed/GPU is too broad to be adequately handled by the Rad Prot. & Chem. Supervisor/Group Leader. I recommend that Met-Ed/GPU separate chemistry/radiochemistry as an independent function under the Mgr.-Support Services and Logistics, for example.
4. The training function is only addressed in a cursory way in the Met-Ed/GPU document. I consider that radiation protection training should be a separate function with a supervisor assigned. I would make this training supervisor responsible for the radiation protection training required by 10 CFR Part 19 as well as a coordinator of training activities for radiation protection personnel.
5. The responsibilities of the H.P. foremen for both Units should be expanded to include all that will be expected of them. For example, a listing of the station procedures they are responsible for implementing may be appropriate.
6. The Radiological Engineering/ALARA group responsibilities should be augmented to include the function of reviewing maintenance, repair, and recovery procedures to assure that adequate radiation protection is included in the procedure and that such procedures are designed to assure that exposures to workers will meet man-rem goals and will be ALARA.
7. The H.P. Audit Program function is located satisfactorily. The workings of this audit program on a routine basis including commitments for follow-up and corrective action should be detailed in a separate procedure.
8. There is no technical support function detailed in the Met-Ed/GPU organization. Such a technical support function should be staffed by professional radiological engineers and health physicists to provide consultation and advice on technical matters such as external and internal dosimetry, instrumentation, respiratory protection, surveying sampling and measurement techniques, emergency planning, etc.
9. I've reviewed D. Neely's memo to you dated 8/21/79 on this subject and consider my comments to be consistent with his.

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J. T. Collins

- 3 -

August 24, 1979

10. I've attached a visualization of the organizational concepts I discussed above (Fig. 1).

/s/

Thomas D. Murphy, Chief
Radiological Assessment Branch
& IMI-2 Support Task Force

Attachment:
Figure 1

cc: R. Vollmer
W. Kreger, DSE
D. Neely, IE

Distribution:
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FIGURE 1

