

October 22, 1982

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

RE: Docket No. 50-220
Inspection Report 82-14

Dear Mr. Starostecki

This refers to the routine, safety inspection conducted by Mr. S. Hudson of your office on August 1-31, 1982 at Nine Mile Point, Unit 1, Scriba, New York of activities authorized by NRC License No. DPR-63 and to the discussions of your findings held by Mr. S. Hudson with Mr. T. Roman of our staff at the conclusion of the inspection.

ITEM A

Technical Specification 6.11 states: "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure."

Radiation Protection Procedure RP-2, "Radiation Work Permit Procedure," Revision 1, dated February 13, 1979 requires in Section 5.6, that if a qualitative fit test is specified on the RWP, indication of having passed the test must be indicated by a "✓" in the "Passed Fit Test" column when signing in.

RWP #1166 dated August 26, 1982 for work inside the drywell and on Reactor Building elevation 237', required a fit test for those individuals wearing full face respirators.

Contrary to the above, on August 26, 1982, ten individuals required to wear full face respirators had not indicated that a qualitative fit test had been performed.

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

RESPONSE

In response to Appendix A of the above referenced Inspection Report, the following actions have been taken:

The RWP procedure was reviewed with respect to the necessity for the procedure step cited in the violation. Although it is a recommended practice (NUREG 0041, Section 8.5.2.3) to perform a qualitative fit test whenever donning a respirator, this is only one of a dozen or more procedural steps that are performed in the course of using a respirator. In an attempt to assure that a fit test is performed, the procedure step to require documentation of the fit test was added to the procedure some years ago. In practice this has placed an unnecessary administrative burden on workers using respiratory equipment, since donning a mask rarely, if ever, occurs at the RWP location (access control point). The required documentation would have to be accomplished by donning the mask at the access point before it was required to be used (so the record could be made after the test was performed), or returning to the access point prior to entering the airborne area or beginning the task which would lead to the creation of the airborne activity. Since neither of these alternatives are convenient, there have been occasions when the "Passed Fit Test" column has been left blank.

We do not believe that this procedural lapse actually represents failure to perform the recommended fit test.

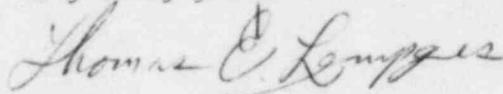
The RWP procedure was revised (SORC reviewed 9/15/82) to provide a more reasonable and enforceable documentation requirement. Since seal leakage is more likely to occur when using a half-face respirator than when using a full face respirator, procedure section 5.10 of RP-2 now requires documentation of the performance of the fit test only when using a half-face respirator when a protection factor is required. To ensure the test has been performed, Section 5.11 requires the technician witnessing the test to perform the documentation.

ITEM A RESPONSE (Continued)

Since the above changes constitute a slight procedural relaxation of requirements, the procedure change will be included in the General Employee Training revision currently being formulated, rather than by holding special training sessions. Technicians will be informed of the change via supervisory instruction and routed reading.

Full compliance will be considered achieved when the supervisory instruction has been routed to all technicians responsible for RWP implementation. This will be accomplished by October 31, 1982.

Very truly yours



Thomas E. Lempges
Vice President, Nuclear Generation

TEL/EFD/jm