

Nebraska Public Power District

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April 11, 1983



Mr. G. L. Madsen
Reactor Project Branch I
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/82-32

Dear Mr. Madsen:

This letter is written in response to your letter dated March 7, 1983, transmitting Inspection Report No. 50-298/82-32. Two items were identified during the inspection as being in violation of NRC requirements and one item identified as a deviation from a commitment to the NRC.

As stated in the above letter, the NRC inspector reviewed corrective action in regard to item 1 in Appendix A, Notice of Violation, and therefore, no response is required for this item.

We were required to submit a reply to you within 30 days of the notice, that is, by April 6, 1983. However, because of delays in attempting to gather more information regarding the deviation and the interference of the recent Emergency Exercise with preparation and review of this response, L. C. Lessor requested and was granted an extension by you on April 6, 1983.

Following is the statement of violation, item 2, Appendix A, Notice of Violation and our response in accordance with 10CFR2.201.

Statement of Violation

10 CFR Part 20.103(C)(2), "Exposure to Individuals to Concentrations of Radioactive Materials in Air in Restricted Areas," requires that a determination by a physician prior to the initial use of respirators, and at least every 12 months thereafter, that the individual user is physically able to use the respiratory protective equipment.

Contrary to this requirement, the NRC inspectors found that after an initial determination is made by a physician, the health physics department makes the 12-month determination that an individual user is physically able to use respiratory protective equipment.

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Discussion

With regard to a determination of the individual user's physical ability to use respiratory protection equipment, the station respiratory protection program was in compliance with 10CFR20.103(C) until April 15, 1982 when this rule was amended by 47CFR16162. That amendment introduced a requirement for physician determination of user physical ability at least every twelve months. Prior to the amendment, our program complied with NRC guidance which required "only an initial medical determination and an annual review of medical status."

Corrective Steps Which Have Been Taken and the Results Achieved

Several medical physicals are required to meet NRC requirements for the various activities conducted at CNS. These activities include such items as fire fighting, visual examination of new fuel, operator licensing, and security screening as well as use of respiratory protection equipment. In addition, NPPD management has a corporate interest concerning the medical status of its employees at CNS. However, the requirement for a separate medical examination for each specific activity has introduced a significant fiscal and manpower impact. Much redundancy is also involved, as many medical tests are repeated for each type of examination. To avoid these inefficiencies, CNS has consolidated all the medical physical examination requirements, including respiratory protection requirements, onto one medical form (except for the NRC form for operator licensing program physicals). Administrative Procedure 1.5 and Health Physics Procedure 9.1.5 have been revised to include this form and annual physical examinations which meet respiratory protection standards are now required for all CNS employees. These examinations are conducted by a physician.

To date all station employees have completed the medical physical for use of respiratory protection equipment except for those employees who have either had a medical physical within the last six months or are in the operator licensing program. These exceptions will be scheduled for medical physicals within the next six months or in conjunction with their operator licensing physical if they are involved with this program. Physicals will be scheduled such that all employees will have had a medical examination by a physician within the last twelve months.

Corrective Steps Which Will Be Taken to Avoid Further Violation

A monitoring program has been established to identify the date of the last medical physical of each employee so they will be medically examined by a physician at least every 12 months.

The Date When Full Compliance Will Be Achieved

We will be in full compliance by November 1, 1983.

Following is the statement of deviation in Appendix B, Notice of Deviation and our response in accordance with this Notice of Deviation.

Statement of Deviation

IE Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," dated August 10, 1979, describes action to be taken by licensees to assure that safe transfer, packaging, and transport of low-level radioactive waste. Specifically, Item 5 requires, in part, that the licensee is expected to maintain a record of training dates, attendees, and subject material for future inspections by NRC personnel. A licensee letter of August 31, 1979, in response to IE Bulletin 79-19, from Jay M. Pilant, Director of Licensing and Quality Assurance, Nebraska Public Power District, to Mr. Karl V. Seyfrit, Director, Region IV, U.S. Nuclear Regulatory Commission, stated, in part, in Items 5 and 6 that training records will be available for future inspection by NRC personnel.

In deviation from the above, the NRC inspectors found that training records were not available for two individuals involved in the transfer, packaging, and transport of radioactive material.

Discussion

We have contacted the NRC inspector involved to identify the two CNS individuals referred to in the statement of deviation. This effort was partially successful in that one individual was identified. Unfortunately, the second individual whose training records may not have been available has not been identified. Since it is not clear what responsibility or participation the second individual may have had in the observed radioactive waste handling procedures, this response to the deviation must necessarily be limited to a discussion of the one identified individual involved.

The deviation statement indicates that "training records were not available." We interpret this to mean that training records did not reflect all the specific training that this individual had received to conduct handling and packaging of radioactive material. It has been our experience that lecture and demonstration type training, while most amenable to documentation and audit, do not adequately prepare an individual to handle and package radioactive materials. CNS has established a detailed program of on-the-job training to fully prepare an individual for operating all the various radwaste systems as well as packaging and handling solid radiological waste. The individual observed is a participant in this program. Our records indicate that this individual had documented completion of 404 hours of formal training in his training record at the time of the inspection much of which involved work in processing radiological waste.

The individual observed in the detailed on-the-job training was under the direction of the senior radiological waste plant operator. In view of this deviation, the supervisor's records were checked to verify that the supervisor had received training in radioactive material shipments, radiological waste

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processing, and radioactive material shipments. The records show that the supervisor had completed this training prior to the date of the inspection.

Corrective Steps Which Have Been Taken and the Results Achieved

The licensee agrees to continue to document training as indicated in the commitment in the statement of the deviation.

Corrective Action Which Will Be Taken to Avoid Further Deviations

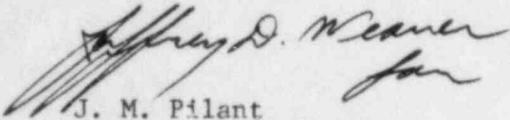
The licensee agrees to continue to document training as indicated in the commitment in the statement of the deviation.

The Date When Full Compliance Will Be Achieved

The licensee is currently in full compliance.

If you have any questions in regard to this response, please contact me or L. C. Lessor at the site.

Sincerely,



J. M. Pilant
Director of Licensing
and Quality Assurance

JMP:JVS:KRW:cg