

OCT 28 1971

50-133

Pacific Gas and Electric Company
ATTN: Mr. Frederick T. Searls
Vice President and General Counsel
77 Beale Street
San Francisco, California 94106

Gentlemen:

This letter refers to the investigation conducted on May 11-12, 19-20, 26-28, July 20-21, and August 2, 1971, of allegations we received regarding your activities authorized under AEC License No. DPR-7. It also refers to the discussions held between Messrs. G. S. Spencer and J. J. Ward, Division of Compliance, and P. Matthew, Manager, Steam Generation Department, and J. C. Carroll, Supervising Steam Generation Engineer, on September 9, 1971.

Areas examined during this investigation covered 49 separate instances wherein radiation protection procedures or practices were alleged by a complainant to be deficient or radiation incidents were alleged to have occurred. Within these areas, the investigation consisted of examinations of pertinent procedures and plant records, interviews with persons who might have firsthand knowledge of the specific incidents or allegations, and observations by the inspectors.

During the investigation it was found that certain of your activities appeared to be in noncompliance with license requirements. These matters, which were discussed with your representatives at the September 9, 1971 meeting, are identified in the enclosure to this letter.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within 20 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken; and (3) the date when full compliance will be achieved.

In addition to the items of noncompliance, certain other matters were identified by our inspectors in the course of the investigation. We believe these matters also warrant your consideration.

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- a. A potential exists for your plant domestic water system to become contaminated with radioactive water via a connection with the fire protection system. We understand that there is no routine program for analyzing samples of water from the fire protection and domestic water systems.
- b. Our investigation revealed instances where safety related operations were conducted without benefit of sdequate training. For example, on one occasion, fuel handling operations were conducted by an operator who had not been trained adequately with respect to the radiation hazards associated with these operations. It would appear that this is indicative of a weakness in your training program for new personnel.
- c. A number of current Radiation Work Procedures (RWP) do not comply with Pacific Gas and Electric Company standards in that they do not always establish existing radiation levels at the time the work is to be performed or the critical body organs associated with potential radiation exposures in radiation work permit areas.
- d. In at least one instance, one of your employees was discouraged by plant management personnel from talking with an AEC inspector on matters of safety interest. As stated on AEC Form 3, each employee should be free to communicate with the AEC concerning any matters relating to public health and safety.

In reply to this notice, please provide us with your comments concerning items a. through d. above, and describe the steps taken or planned, as appropriate, to improve the radiation protection practices at your Humboldt Bay facility.

Very truly yours,

Original signed by

L. D. Low

L. D. Low, Director
Division of Compliance

Enclosure:
Items of noncompliance with
Regulatory requirements

bcc:w/enclosure

PAMorris, DRL
AGIambusso, CO
DJSkovholt, DRL
DLZiemann, DRL

DR Reading File
REG Central File
ACRS (3)
PDR

NSIC
RLShannon, OR
CO:I, II, III, IV, V

OFFICE ▶	7M CO	CO	CO	CO	CO
SURNAME ▶	FJNolan:nw	MGreppler	RHEngelken	DJSkovholt	LDLow
DATE ▶	10/27/71	10/27/71	10/27/71	10/27/71	10/27/71

Enclosure

PACIFIC GAS AND ELECTRIC COMPANY

Items of noncompliance with Regulatory requirements:

1. Paragraph 10 CFR 20.201(b) of the AEC's Standards for Protection Against Radiation requires each licensee to make such surveys (evaluations) as may be necessary to comply with the regulations in 10 CFR 20.

Contrary to paragraph 10 CFR 20.201(b), our review of station records disclosed that surveys (evaluations) were not adequate to determine compliance with 10 CFR 20.103 with respect to airborne concentrations of radioactive material to which employees were exposed on June 21, 1970, when an entry was made into the drywell access shaft to investigate the failure of the cleanup pump seal.

2. Paragraph 10 CFR 20.408 of the AEC's Standards for Protection Against Radiation requires each licensee to furnish an individual terminating employment, a report of the individual's exposure to radiation and radioactive material, incurred during the period of employment in the licensee's facility, within 90 days after the date of termination of employment.

Contrary to paragraph 10 CFR 20.408, our investigation disclosed that a report of the radiation exposure history of an employee who terminated employment was not furnished to him until several weeks after the 90 day time limit.