U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No. 50-333/84-06

Docket No. 50-333

License No. DPR-59 Priority -

Category C

Licensee: New York Power Authority P. O. Box 41 Lycoming, New York 13093

Facility Name: James A. Fitzpatrick Nuclear Power Plant

Inspection At: Scriba, New York

Inspection Conducted: April 16-20, 1984

Inspectors:

Dragoun, Radiation Specialist

Approved by:

M. Shanbaky, Chief, Facilities Radiation Protection Section

114/84 date

Inspection Summary: Inspection on April 16-20, 1984 (Inspection Report No. 50-333/84-06)

<u>Areas Inspected</u>: Routine, unannounced safety inspection by one region-based inspector of the licensee's Radiation Protection Program. Areas inspected included: organization and staffing; personnel selection, qualification and training; exposure control; and ALARA implementation. The inspection involved 37 inspector-hours on site by one inspector.

Results: No violations or deficiencies were observed. Licensee action on three open items was satisfactory.

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DETAILS

1. Persons Contacted

During the course of this routine inspection the following personnel were contacted or interviewed:

1.1 Licensee Personnel

*J.P. Bayne, Executive Vice President, NYPA
*C.A. McNeill, Resident Manager, J. A. Fitzpatrick, NYPA
*R. A. Burns, Vice President BWR Support, NYPA
*R. Converse, Superintendent of Power, JAF
*E. Mulcahey, Radiological and Environmental Services Superintendent
*R. L. Patch, Quality Assurance Superintendent
*M. Curling, Training Superintendent
*D. Dooley, Radiological Engineer
*C. J. Gannon, Health Physics General Supervisor
T. Bergene, ALARA Supervisor
J. McCarty, Respiratory Protection Supervisor
M. McMahon, Dosimetry Supervisor
K. Szeluga, Radiation Protection Supervisor

1.2 NRC Personnel

*L. Doerflein, USNRC Senior Resident Inspector

*Attended the Exit Interview of April 19, 1984

2.0 Purpose

The purpose of this routine inspection was to review the licensee's radiation protection program with respect to the following elements:

- Status of Previously Identified Items
- Personnel Selection, Qualification and Training
- Exposure Control External/Internal
- ALARA

3.0 Status of Previously Identified Items

3.1 (Closed) Inspector Follow-up Item (80-20-28) Establish, document and implement a formal corporate and plant ALARA program, provide necessary personnel and establish procedural action levels. (Significant Appraisal Findings G1, G2, and G3). An ALARA program has been implemented by procedures AP6.3, REP-1, REP-2, REP-3, REP-4 and NUAP 5.9; a full time professional ALARA staff is provided; work packages are reviewed in accordance with estimated man-rem exposures.

- 3.2 (Closed) Inspector Follow-up Item (83-25-01) Repair respirator fit test booth and retest personnel. The booth is repaired and a stock of repair parts has been obtained. Workers were retested as required.
- 3.3 (Closed) Inspector Follow-up Item (83-25-02) Qualify technicians to test breathing air. Revised procedure RTP-8 paragraph 4.1.1 allows only qualified technicians to test breathing air.
- 3.4 (Open) Inspector Follow-up Item (83-25-03) Expand calibration records to explain reason for frequent calibrations, dates the meter was out of service and "as found" response. Equipment records now include all pertinent information. Calibration is still performed at only one point per range on linear scale meters. The licensee is gathering data to determine if one point calibration would statisfy the intent of ANSI-N323 recommendations. This study is scheduled for completion in July 1984.

4.0 Personnel Selection, Qualification and Training

Personnel selection qualification and training were reviewed against criteria contained in:

- 10 CFR 19.12, "Instructions to Workers"
- ANSI 18.1 1971 "Selection and Training of Nuclear Power Plant Personnel"
- Technical Specification 6.3, "Plant Staff Qualifications"
- Technical Specification 6.5.2.8 "Audit" (Safety Review Committee)
- Department Standing Order No. 3 "Organization of the RES Department" Revision 4
- Procedure ITP-11 "Training of Professional Personnel" Revision 1

The licensee's performance relative to these criteria was determined by:

- Interviews with RES, QA and Training Department supervisors
- Review of job descriptions
- Review of audits and appraisals performed by the licensee

Within the scope of this review no violations were identified, however, the following improvement items were noted:

Technical Specification 6.5.2.8 requires an annual audit of the training, qualifications and performance of the entire plant staff by the Safety Review Committee (SRC). The site QA organization performs audits for the SRC in accordance with procedure SRCP 18.1. However, this procedure does

not clearly relate the annual audits to the TS requirements. The licensee stated that procedure SRCP 18.1 would be revised to indicate this relationship and audits will be repeated if necessary. This matter will be reviewed during a future inspection (84-06-01).

The training and qualification of contractor health physics technicians is provided by both the Training Department and the Radiological and Environmental Services Department. Overall responsibility should be assigned to one department to ensure that all required training is complete and satisfactory. The licensee stated that the assignment of training responsibility will be examined to evaluate the effectiveness of placing the contractor technician training under the RESS department. This matter will be reviewed during a future inspection (84-06-02).

5.0 Exposure Control

5.1 External Exposure Control Program

The external exposure control program was reviewed against criteria contained in:

- 10 CFR 20.101 Radiation dose standards for individuals in restricted areas
- 10 CFR 20.102 Determination of prior dose
- 10 CFR 19.13 Notifications and reports to individuals
- 10 CFR 20.401 Records of surveys, radiation monitoring, and disposal
- 10 CFR 20.408 Reports of personnel monitoring on termination of employment or work.
- Technical Specification 6.10 Record Retention
- Regulatory Guide 8.4 "Direct Reading and Indirect Reading Pocket Dosimeters"
- ANSI-N322-1977, "Inspection and Test Specifications for Direct and Indirect Reading Quartz Fiber Pocket Dosimeters
- Licensee procedure titled "Radiation Protection Procedures"

The licensee's performance relative to these criteria was determined by:

- Examination of selected records
- Interviewing selected personnel

Within the scope of this review, no violations were identified. The inspector noted that the licensee is revising the procedures regarding routine dose rate surveys to eliminate the need to cross reference several charts and to expand and improve the recorded information.

5.2 Internal Exposure Control Program

The Internal Exposure Control Program was reviewed against criteria contained in:

10 CFR 20.103 Exposure of individuals to concentrations of radioactive materials in air in restricted areas.

Regulatory Guide 8.15, "Acceptable Program for Respiratory Protection".

RTP-8 "Breathing Air Quality, Sampling and Analysis" Revision 3

The licensee's performance relative to these criteria was determined by:

- Observation of respirator fit testing
- Interviews with selected personnel
- Review of selected records

Within the scope of this review, no violations were identified.

6.0 ALARA

The implementation of the ALARA program was reviewed against criteria contained in:

- 10 CFR 20.1 Purpose
- Regulatory Guide 1.33 Quality Assurance Program Requirements
- Regulatory Guide 8.8
- Regulatory Guide 8.10
- JAF Procedure REP-1 "ALARA Review" Revision 0
- JAF Procedure REP-2 "ALARA Reports" Revision 0
- JAF Procedure REP-3 "Containment Selection and Use" Revision 0
- JAF Procedure REP-4 "Selection and Use of Temporary Shielding" Revision 0

Within the scope of this review, no violations were identified. The inspector noted that the licensee had completed implementation of an ALARA program in late 1983 and has issued the first annual ALARA report. This report shows a reduction of about 10% in total exposure from the previous year and anticipates an additional 30% reduction in 1984.

7.0 Exit Interview

On April 19, 1984 the inspector met with the licensee representatives denoted in paragraph 1. The inspection scope and findings were reviewed at that time. At no time during this inspection was written material provided to the licensee by the inspector.