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RECORD #36 (See 15)

TITLE: Posting of Entrances to a Large Room or Building as
Radiation Area

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PDR ORG NRRB PDR

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January 27, 1984

Carolina Power and Light Company
ATTN: Mr. E. E. Utley
Executive Vice President
411 Fayetteville Street
Fayetteville, NC 27602

Gentlemen:

SUBJECT: REPORT NOS. 50-325/80-45 AND 50-324/80-43.

Our letter dated June 15, 1981, stated that Violation D of Inspection Report Nos. 50-325/80-45 and 50-324/80-43, regarding radiation area posting of reactor buildings was under review and that our final decision would be issued at a later date. On October 7, 1981, in a letter to NRR, you requested a written interpretation of the requirements set forth in 10 CFR 20.203(b), and 10 CFR 20.202(b)(2). That request was subsequently forwarded to Region II for evaluation and action.

Your request that Violation D be withdrawn and your request for interpretation have been evaluated by the NRC staff. The NRC position is that posting practices must adequately alert personnel to the presence of radiation areas such that they may minimize exposures they receive. Your practice of posting only the entrances to the Brunswick reactor building does not provide personnel with sufficient information for them to be able to minimize exposures from the radiation areas within the reactor building. Therefore, the violation will remain as written.

The intent of 10 CFR 20.202(b)(2), and 10 CFR 20.203(b) is to alert personnel to the presence of radiation and to aid them in minimizing exposures. We realize that circumstances of each case must be evaluated to assure that posting practices do not detract from this intent by (1) desensitizing personnel through over-posting, or (2) failing to sufficiently alert personnel to the presence and location of radiation areas. Thus, radiation area postings should warn individuals in the vicinity of radiation areas of specific radiological conditions in their immediate vicinity. By the same token, it is also considered outside of the regulations and counter-productive if substantial areas which are not radiation areas are posted as such. Since the regulations do not provide implementing details such as whether a room or building containing a radiation area may be posted at the entrance or whether every discrete radiation area must be posted, the following is used as guidance: Posting the entrances to a very large room or building is inappropriate if most of the area is not a radiation area and only discrete areas or individual rooms actually meet the criteria for a radiation area. If discrete areas or rooms within a large area or building can be reasonably posted to alert individuals to radiation areas, these discrete areas or rooms should be posted individually.

This interpretation is the official NRC staff position, but as such, is not binding on the Commission. Such binding interpretations can only be issued by the Office of the General Counsel pursuant to 10 CFR 20.6. The office of the General Counsel normally refers technical matters such as this issue to the NRC staff for resolution.

Your letter of October 7, 1981, enumerated six reasons for posting the entrances to buildings as radiation areas instead of discrete areas within the buildings. None are sufficient individually or collectively, to effectively aid the workers in minimizing their exposure. They do not provide a substitute for the information or worker awareness provided by a posted sign that identifies the presence and approximate boundary of specific radiation areas and do not support ALARA as discussed in 10 CFR 20.1(c).

We continue to maintain that most of the area within the reactor building at your Brunswick facility fails to meet the criteria for a radiation area. Consequently, posting just the entrances to the reactor building does not meet the intent of the regulations.

We appreciate your cooperation with us.

Sincerely,

(Original signed by RDMartin)

James P. O'Reilly
Regional Administrator

cc: P. W. Howe, Vice President
Brunswick Nuclear Project
C. R. Dietz, Plant General Manager

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