

John D. O'Toole
Vice President

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4 Irving Place, New York, NY 10003
Telephone (212) 460-2533

May 24, 1984

Re: Indian Point Unit No. 2
Docket No. 50-247

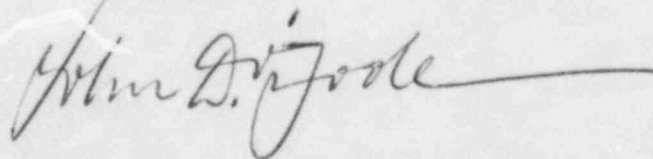
Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/84-08 conducted by Messrs. T. Foley and P. Koltay of your office, March 1 to April 8, 1984 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your April 24, 1984 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to the Notice is presented in Attachment A to this letter.

Should you or your staff have any questions, please contact us.

Very truly yours,



cc: Mr. Thomas Foley, Senior Resident Inspector
U. S. Nuclear Regulatory Commission
Post Office Box 38
Buchanan, New York 10511

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ATTACHMENT A

Response to Notice of Violation
Appendix A

VIOLATION A

10 CFR 20.201 requires in part that the licensee make surveys as may be necessary and reasonable under the circumstances to evaluate the radiation hazards that are present.

Technical Specification, Section 6.12.1 requires that individuals entering high radiation areas be provided with radiation monitoring devices which continuously indicate the radiation dose rate in the area.

Contrary to the above, on March 26, 1984, during an inspection within high radiation areas inside the reactor containment building, with the plant at 100% power, members of the inspection party accessed high radiation areas without the benefit of instruments which continuously indicate the radiation dose rate in the area, and without the benefit of radiological surveys or other information for the specific areas inspected.

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

RESPONSE

The event was critiqued with the individuals involved. In accordance with procedures, Station Administrative Order 132, a report, including corrective actions taken and that will be taken, was issued. The report was routed to all Operations Section personnel in addition to the normal management distribution. The event was reviewed with all Operations supervisory personnel. Additional ALARA emphasis will be included in the training for Nuclear Plant Operators. The training will be completed by November 2, 1984.

The Radiation Protection Section reviewed with all Health Physics Technicians the survey requirements when they provide escort in high radiation areas. Station Administrative Order (SAO) 134 is being revised to more clearly define the functions of the Health Physics Technicians (HPs) accompanying work parties. The SAO will further require a briefing on its requirements by a Radiation Protection Supervisor or designee at pre-entry planning meetings. Members of the work party are not to enter any area without it being surveyed by the HP and all members of the work party are to stay with the HP at all times. The procedure revision will be completed by July 6, 1984.

VIOLATION B

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33. Section G.5.a of Appendix A to Regulatory Guide 1.33 includes procedures addressing restrictions and activities in high radiation areas.

Station Administrative Order, SAO 134, Revision 0, "High Radiation Exposure Tasks" and attachment 1, No. 84-01, requires the licensee to ensure that tasks performed in high radiation areas are properly planned and understood, that a procedure is prepared for the work, and personnel are briefed prior to entering high radiation areas. Attachment I requires use of lapel air samplers for each group of personnel entering the containment.

Contrary to the above, an inspection of the reactor containment building (a high radiation area) was conducted on March 26, 1984, without the benefit of a pre-inspection plan and/or briefing, and several tasks accomplished during the entry were not included in the work procedures. Lapel air samplers were not used by any individual or group entering the containment.

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

RESPONSE

This event was included in the critique and the report described above in the response to Violation A. Formal documentation of pre-entry planning

meetings has been implemented. The requirement for this documentation will be included in the revision to SAO-134 which will be issued July 6, 1984. The revision will also provide guidelines for items that are to be discussed at that meeting such as survey requirements, HP escort requirements, personnel monitoring devices such as lapel air samplers, path of travel and items to be inspected. As described above a Radiation Protection Supervisor or designee will conduct the meeting. The Senior Watch Supervisor will specify the operational requirements for entries inside the crane support wall. The need to conduct pre-entry planning will be reemphasized in the training for Nuclear Plant Operators described above in the response to Violation A.