## U. S. NUCLEAR REGULATORY COMMISSION

# REGION III

Report No. 50-330/84-17(DRMSP)

Docket No. 50-330

License No. CPPR-82

Licensee: Consumers Power Company 1945 W. Parnall Road Jackson, MI 49201

Facility Name: Midland Nuclear Plant, Unit 2

Inspection At: Midland Nuclear Plant Site, Midland, MI

Inspection Conducted: May 30 and June 1, 1984

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Inspectors: W. B. Grant

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Approved By: L. R. Greger, Chief Facilities Radiation Protection Section

Inspection Summary:

Inspection on May 30 and June 1, 1984 (Report No. 50-330/84-17(DRMSP)) Areas Inspected: Routine, preoperational inspection of the radiation protection program, including: organization and management controls; training and qualifications; facilities and equipment; and the status of previous inspection findings. The inspection involved 13 inspector-hours on site by one NRC inspector. Results: No violations or deviations were identified.

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6/13/84 Date 6/13/84

## DETAILS

#### 1. Persons Contacted

- \*C. Axtell, Plant Health Physicist
- \*D. Anderson, Quality Assurance
- C. Brown, Radiation Safety Supervisor
- \*T. Buczwinski, Technical Engineer
- \*G. Hinsley, Superintendent, Chemistry/Health Physics (CHP)
- L. Kenaga, Senior Health Physicir
- E. Oswood, Radiation Protectic Supervisor
- M. Price, Training Coordinate
- B. Burgess, Senior Resident Inspector

\*Denotes those present at the exit meeting.

### 2. General

This inspection which began at 8:00 am on May 30, 1984, was conducted to examine the licensee's provisions for staffing, training, radiation protection procedures, and facilities and equipment necessary to comply with regulatory requirements and commitments made in the Final Safety Analysis Report (FSAR).

#### 3. Organization and Management Controls

The inspector reviewed the licensee's organization and management controls for the chemistry and radiation protection programs including: responsibilities, authorities, and staffing. Since the last inspection in June, 1983, the Superintendent, Chemistry/Health Physics (CHP) has been appointed Director of Nuclear Operations Training at the corporate office. The Nuclear Training Center Supervisor has been appointed to fill the CHP Superintendent position. In addition, one emergency planning coordinator, a chemical engineer, the environmental supervisor, a chemistry supervisor, and ten radiation protection technicians have left the department. Due to the "indefinite deferment" status of Unit One, the licensee is planning to fill some but not all of these vacant positions. No problems were noted.

#### 4. Training and Qualifications

The inspector reviewed the training and qualifications aspects of the licensee's radiation protection program including training responsibilities, policies, goals, programs, and the qualifications of radiation protection personnel. The licensee's technician qualification card program has been developed and is being implemented. The licensee's CHP department currently has 58 technicians; 16 are categorized technician I, 35 as technician II (considered ANSI 18.1 qualified), and seven are senior technicians. In addition to the required formal courses and completion of certain practical factors, the technicians are provided "hands on" experience in radiation protection during operations and outages at Palisades and Big Rock Point. No problems were identified.

# 5. Facilities and Equipment

The inspector reviewed the facilities and equipment used by the licensee for radiation protection activities to determine whether they are as described in the FSAR and are adequate to support the radiation protection program. The instrument calibration room and the 1000 Curie Cs-137 calibration source have recently been turned over to the licensee by the contractor. The inspector toured the instrument calibration room and the facility appeared adequate. The licensee is currently calibrating portable survey instruments in support of the station's byproduct material license program. No problems were identified.

## 6. Radiation Protection Procedures

The inspector reviewed the following health physics procedures to determine if they are consistent with 10 CFR 19 and 20, FSAR commitments, and good health physics practices.

ST 1201.01,	Original	Radiation Safety Program
ST 1215.1,	Revision 1,	Management of Licensed Radioactive
CHP 1215.1.	Revision 1	Receipt of Radioactive Material
CHP 1215 2	Revision 1	Inventory of Radioactive Material
CHP 1215 3	Revision 2	Source Leak Test Method
ST 1216.1,	Original,	Effluent Release Permits and Sample/ Analysis Requests
CHP 1216.1,	Revision 1,	Radiological Effluent Accountibility and Reporting
ST 1220.5,	Original,	ALARA - Work Procedure Review
ST 1220.7,	Original,	ALARA Surveillance
ST 1221.2,	Original,	RWP - Process and Control
ST 1245.1,	Original,	Site Personnel Response to Unusual Occurrence Involving Radiation Safety
CHP 8020.3,	Revision 1,	Temporary Employee and Contractor Chem/HP Qualification
CHP 8030.1,	Revision 2,	Radiation Protection Standards for Byproduct Material Use
CHP 8030.2,	Revision 2,	Personnel Dosimetry for Byproduct Material Use
CHP 8030.3.	Revision 4.	Handling of Radioactive Materials
CHP 8030.6,	Revision 6,	Receipt and Accountability of Byproduct Material
CHP 8101.2,	Revision 4.	Construction/Chemistry Analytical Records
CHP 8103.1.	Original,	Secondary Water Chemistry Monitoring Program
CHP 8120.1.	Original,	Sample Point Locator
CHP 8120.3,	Original,	Reactor Plant Sample Point Operation
CHP 1005.01,	Revision 1,	Station Organization and Responsibility
CHP 1005.01,	Revision 1,	CH/HP Organization and Responsibility
CHP 1062.01,	Revision 1,	Maintenance of Nonrad Respiratory Equipment
CHP 1057.04,	Original,	Radiation Safety Instrument Calibration and Control

It was noted that recent changes in 10 CFR 71 (NRC) and 49 CFR 173 (DOT), which list individual type A quantities and limit the radiation from any package surface to 1000 mrem/hr, have not been incorporated into the licensee's procedures. According to the licensee, they are aware of the changes and the procedures will be revised in accordance with the regulations prior to shipments of radioactive materials. This was discussed at the exit meeting and will be reviewed during a future inspection. (330/84-17-01)

The licensee estimates that approximately 94% of the radiation protection and chemistry procedures have been written and approved. About one half of the remainder are in the review process. No other problems were identified with the procedures reviewed.

## 7. Victoreen Inc - Radiation Monitoring System (RMS)

According to the licensee, all defective modules in the safety related components of the RMS have been returned to Victoreen for replacement. The licensee stated that 100% of the modules will be inspected when they are returned to the Midland Site. The licensee continues to have some difficulty coordinating the calibration and programming of the equipment with Victoreen, Inc.

The Vendor Program Branch, NRC Region IV conducted a follow-up inspection of Victoreen, Inc. on July 11-15, 1983 Report No. (99900377/83-01). One violation and two nonconformances of minor significance were identified. The two violations and four nonconformances identified during the previous inspection (99900377/83-01) were all satisfactorily corrected and closed. The report agrees with Victoreen Inc's conclusion that the workmanship deviations in the electronic modules were not reportable defects under 10 CFR Part 21; i.e., the deviations could not create a substantial safety hazard. This was discussed at the exit meeting and will be reviewed during a future inspection after the modules have been returned and inspected.

## 8. Exit Meeting

The inspector met with licensee representatives (denoted in Section 1) at the conclusion of the inspection on June 1, 1984. The inspector summarized the scope and findings of the inspection. In response to certain items discussed, the licensee:

- a. Stated that procedures for shipment of radioactive material would be revised to meet current NRC and DOT regulations. (Section 6)
- Stated that 100% of all Victoreen replacement modules will be inspected prior to acceptance and installation. (Section 7)