

NOTICE OF VIOLATION

Consumers Power Company
Palisades Nuclear Generating Plant

Docket No. 50-255
License No. DPR-20
EA 84-38

As a result of an inspection conducted on March 22-23, 1984, and in accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984), the following violations were identified:

- A. 10 CFR 20.101(b) states in part that during any calendar quarter total occupational dose to the whole body of an individual shall not exceed 3 rems. "Dose to the whole body" is deemed to include any dose to the whole body, gonads, active blood-forming organs, head and trunk, or lens of eye.

Contrary to the above, an individual who worked as a diver in the refueling cavity during the first calendar quarter in 1984 received a dose of about 4.5 rems to the right leg above the knee, a portion of the body covered by the whole body dose limit of 3 rems per quarter.

- B. Technical Specification 6.12 requires that any individual entering a high radiation area be provided with a dose rate monitoring device, or be provided with a dose rate integrating device which alarms at a preset dose (surveyed areas only), or be accompanied by an individual qualified in radiation protection procedures who is equipped with a dose rate monitoring device, who provides positive control over activities, and who performs periodic surveys as specified by the radiation work permit.

Contrary to the above, on March 18, 1984, a diver made three entries into the refueling cavity tilt machine area, a high radiation area, without being provided with a dose rate monitoring device or a dose rate integrating device or without being accompanied by an individual qualified in radiation protection who was equipped with a dose rate monitoring device and who provided the required controls and monitoring.

- C. Technical Specification 6.11 states that procedures for personal radiation protection shall be prepared consistent with 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personal radiation exposure.

1. Procedure No. 7.02, "ALARA Program," requires that an ALARA review be conducted if, among other things, a potential exists for individual exposure to general area radiation levels greater than 100 mrem/hour; an individual is expected to exceed 1500 mrem whole body dose for a given task in a calendar year; or loose surface contamination exceeds 100,000 dpm/100cm².

Contrary to the above, no ALARA review was conducted of the refueling cavity tilt machine repair job even though surveys and dose estimates indicated that dose rates might exceed 1000 mrem/hour, that the diver's whole body dose was expected to exceed 1500 mrem for the job, and that contamination levels (dry) exceeded 100,000 dpm/100 cm².

2. Procedure No. 7.03, "Radiation Work Permit," requires that a job be secured (stopped) if unplanned changes in working conditions occur which might invalidate the basis for an applicable radiation work permit.

Contrary to the above, the refueling cavity tilt machine repair job was not stopped even though radiation levels in the work area as high as seven times greater than those identified on the radiation work permit were identified.

3. Procedure No. HP 2.14, "Radiological Survey Requirements," states that radiation work permits shall include applicable requirements for continuous, intermittent, and/or pre-job and post-job surveys.

Contrary to the above, the radiation work permit written for the refueling cavity tilt machine repair job did not contain any survey requirements. Surveys conducted during the diving operation were not sufficient to identify the existing radiological conditions.

- D. 10 CFR 20.401 requires that records be maintained of surveys made by the licensee to determine compliance with NRC regulations.

Contrary to the above, no records were maintained of radiation surveys conducted on March 18, 1984, to assess the underwater radiation hazards present in the refueling cavity tilt machine area.

Collectively, these violations have been categorized as a Severity Level III problem (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of compliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

For The Nuclear Regulatory Commission

James G. Keppler
Regional Administrator

Dated at Glen Ellyn, Illinois
this _____ day of July 1984