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SHIELDS L. DALTROFF
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July 11, 1984

Docket Nos. 70-2988
50-352

Inspection Report No. 50-352/84-20

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter dated June 15, 1984, T. T. Martin, NRC, to J. S. Kemper, PECo, forwarded Inspection Report No. 50-352/84-20. Appendix A to your letter addresses an apparent violation of NRC requirements. This item is restated below along with our response.

Special Nuclear Material License No. SNM-1926 dated April 3, 1984 states in License Condition No. 9 that the license is authorized for use in accordance with statements, representations, and conditions specified in the revised application dated January 24, 1984 and its supplements dated February 6 and 27, 1984. The January 24, 1984 letter states, in part, in section 2.1, "Radiation Control", that all instruments shall be tested and calibrated routinely in accordance with approved station procedures.

1. Radiation Protection Procedure No. HP-401, Revision 0, "Control Accountability, Maintenance and Repair of Health Physics Instrumentation," requires in section 6 that all radiation survey equipment in use will be source checked at least daily. If the source check reading is not within ± 20% of the listed reading, the instrument is to be removed from service and tagged. Health Physics Group Information Notice No. 84-01, "Techniques for Performing Response Checks," dated March 13, 1984 specifies that the PRM-6 survey meter with HP-210 probe should read between

35,000 and 50,000 counts per minute (CPM) when source checked.

Contrary to the above, on April 24, 1984, a PRM-6 with HP-210 probe (SN #1123) failed to meet the source check acceptance criteria specified in procedure HP-401 and IN 84-01 and was neither removed from service or tagged. The instrument was used to survey personnel and articles in the fuel receipt area.

2. Radiation Protection Procedure No. HP-469, Revision 0, "Calibration of Eberline PRM-6 Pulse Rate Meter," dated March 20, 1984 requires for calibration (in section 6) that an efficiency determination, using a beta source be performed.

Contrary to the above, on April 24, 1984, an Eberline PRM-6 (SN #1123) with an HP-210 probe, that had not been efficiency checked for beta, was used to check personnel and equipment for contamination.

This is a Severity Level V violation (Supplement IV).

Response

The instrument in question, an Eberline PRM-6 (SN #1123) with an HP-210 probe, was issued for use as a qualitative check for radioactivity, since documented quality assurance of the acceptability of the factory calibration was not available at the time. The technicians using the instrument were instructed that if any radioactivity was detected, another Eberline PRM-6 instrument, with proper calibration documentation must be used to quantify the activity. Therefore, the use of the instrument in question (SN #1123) did not result in any potential radiological hazard with respect to the receipt of fuel.

In response to concerns expressed during the inspection the instrument was removed from service. Efficiency determination and response check were repeated and properly documented. It was determined that the instrument met the criteria specified in applicable Health Physics procedures. In addition, the calibration records of all other radiological control instruments in use by the Health Physics group at that time were reviewed to verify that all efficiencies and response checks had been properly determined.

Additional actions taken include a revision of the Health Physics Equipment Issue Log to include logging of the response check acceptance criteria as well as the results of the check. This revision makes acceptability of the response check more

readily apparent to the technician. In addition, the situation was reviewed with the individuals involved in the operation. A memorandum was also issued to all technicians specifically instructing them to review the applicable acceptance criteria each time an instrument is checked for response.

Completion of the Health Physics Instrument Storage and Issue Facility and continuation of the on-going training program for HP personnel will provide further assurance of an effective radiological instrument control program. This facility is expected to be in operation before September 1, 1984.

Full compliance with the instrument calibration and testing techniques required by the approved station procedures was achieved on April 24, 1984.

If you should have any questions, please do not hesitate to contact us.

Very truly yours,

cc: J.T. Wiggins, Site Inspector
See Attached Service List

cc: Judge Lawrence Brenner
Judge Peter A. Morris
Judge Richard F. Cole
Troy B. Conner, Jr., Esq.
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Mr. Robert L. Anthony
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