



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

Report Nos.: 50-325/95-23 and 50-324/95-23

Licensee: Carolina Power and Light Company
P. O. Box 1551
Raleigh, NC 27602

Docket Nos.: 50-325 and 50-324

License Nos.: DPR-71 and DPR-62

Facility Name: Brunswick Steam Electric Generating Plant Units 1 and 2

Inspection Conducted: November 13-17, 1995

Inspector: W. Rankin 12/12/95
W. Rankin, Senior Project Manager Date Signed

Approved by: T. Decker 12/12/95
T. Decker, Acting Chief Date Signed
Plant Support Branch
Division of Reactor Safety

SUMMARY

Scope:

This routine, announced inspection of the licensee's radiation protection (RP) program involved a review of health physics (HP) activities including: organization and staffing; training and qualifications; internal and external exposure controls; adequacy of controls for radioactive material and radiation areas; and effectiveness of the ALARA program. In addition to the routine inspection performed, inspection activity related to the licensee's mitigation plan for an increased number of off-gas personnel contaminations observed while on site was conducted and details are included in this report.

Results:

Based on independent inspector observations, interviews with licensee management and selected personnel from station departments, and reviews of select records, the inspector determined that the licensee's program for occupational radiation safety was functioning adequately to protect the health and safety of radiation workers onsite. The licensee's programs for control of external and internal radiation exposure were effective in maintaining all exposures well within regulatory limits. The ALARA program continued to

contribute toward the reduction of the total site personnel exposure with overall personnel exposure for the year on an improving trend from the prior year. The licensee's Environmental and Radiation Control (E&RC) Unit staffing level was found to be adequate to support ongoing activities and the staff was found to be well qualified with required training current. At the time of the inspection, improvements in plant physical appearance were noted and housekeeping appeared good as the licensee continued to prestage material and equipment for an upcoming Unit 2 outage. A mitigation plan for controlling off-gas contaminations due to noble gas submersion and reducing related personnel contaminations was initiated during the week of inspection.

Two non-cited violations (NCVs) were identified by the inspector for: 1) Failure of personnel to properly follow decontamination procedures upon exiting the primary Radiation Control Area (RCA) (Paragraph 5.b) and; 2) Failure to post a radiation area in accordance with 10 CFR 20.1902 in order to adequately inform workers of radiological hazards in their work areas (Paragraph 5.c).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- J. Alford, HP Technician, E&RC
- C. Barnhill, Supervisor, Radiological Support
- *W. Campbell, Vice President, Brunswick Nuclear Plant
- E. Cathey, Supervisor, Technical Training
- *R. Foy, Superintendent, Radiation Protection
- *J. Gawron, Manager, E&RC
- *G. Honma, Manager, Licensing & Regulatory Programs
- *W. Levis, Manager, Unit 1
- P. Sawyer, Radiation Control Supervisor
- T. Sellers, Technical Training
- *R. Smith, Senior Specialist, E&RC
- *S. Tabor, Senior Specialist, Regulatory Affairs

Other licensee employees contacted included engineers, technicians, and administrative personnel.

Nuclear Regulatory Commission

- *M. Janus, Resident Inspector

*Attended November 17, 1995 Exit Meeting

2. Organization and Staffing (83750)

The inspector reviewed the licensee's organization, staffing levels, and lines of authority for the E&RC Unit to verify that the licensee had not made changes that would adversely affect the unit's effectiveness in performing its assigned safety functions related to control of radiation exposure. The E&RC Unit was reorganized within the last year and the inspector focused on how effectively the new organization was functioning within the new organizational structure. The inspector reviewed and discussed with licensee representatives any changes made to the E&RC Unit since the last inspection of this area which was conducted August 14-18, 1995, and as documented in Inspection Report (IR) 50-325/95-17 and 50-324/95-17. As identified during that inspection, key superintendent positions remained filled through acting assignment and permanent selections were pending. During this inspection the licensee informed the inspector that permanent selections had been made for all key direct reports to the E&RC Manager, although two of the four positions remained filled by acting personnel at the time of this inspection. The elimination of the ALARA Manager and consolidation of the function at a lower level did not adversely affect ALARA program effectiveness on site or result in decreased program emphasis. Overall the E&RC organization was functioning effectively with no deficiencies noted. The licensee continued to maintain a highly experienced core technician staff of junior

Enclosure

and senior technicians. Based on discussions with licensee representatives and observations of activities in progress, no concerns were identified regarding the licensee's organization and staffing.

No violations or deviations were identified.

3. Radiation Protection Training and Qualifications (83750)

10 CFR 19.12 requires, in part, that the licensee instruct all individuals working in or frequenting any portion of a restricted area in the health protection aspects associated with exposure to radioactive material or radiation; in precautions or procedures to minimize exposure; in the purpose and function of protection devices employed; in the applicable provisions of the Commission regulations; in the individual's responsibilities; and in the availability of radiation exposure data.

The inspector reviewed General Employee Training (GET) and other selected areas of training with a senior training specialist and a technical training manager. The inspector also discussed GET training with contractor and licensee personnel to verify that these personnel understood the scope of selected areas of training. A select list of contractor and licensee employees was chosen in order to verify that each was currently qualified with respect to either the required initial or requalification radiation worker training, and in each case, the required training was found to be current. Emphasis was given during a tour of training facilities on the extent of practical factors training to include adherence to RWP procedures and decontamination practices. The inspector determined that personnel were complying with areas of licensee GET training observed with the exception of a number of personnel not fully complying with decontamination procedures at the south RCA exit. The inspector discussed the adequacy of training in this regard, and reviewed training material and applicable GET quiz questions to ascertain the depth of training presented to radiation workers on decontamination and frisking practices once a contamination monitor had alarmed. Based on this review the inspector determined that the training program was adequate in this regard but noted to the training manager that additional emphasis may be appropriate given the extent of off-gas personnel contaminations primarily from steam leaks currently occurring on site and the inspector observed examples of non adherence with decontamination procedures at the RCA exit (See Paragraph 5.b)

Training requirements and qualifications for E&RC personnel are specified in and must meet or exceed the requirements for radiation protection personnel stated in ANSI N18.1-1971 "Selection and Training of Nuclear Plant Personnel". Due to the relatively recent selections of new personnel to key positions in the E&RC Unit, resumes of key personnel were obtained and reviewed to ensure that minimum standards of required education and applicable experience were satisfied. No deficiencies were identified during this review of qualifications.

No violations or deviations were identified.

4. Internal and External Exposure Controls (83750)

a. Personnel Dosimetry

10 CFR 20.1501(c)(1) and (2) requires that dosimeters used to comply with 10 CFR 20.1201 will be processed and evaluated by a processor accredited by the national Voluntary Laboratory Accreditation Program (NVLAP) for the types of radiation being monitored.

10 CFR 20.1502(a) requires each licensee to monitor occupational exposure to radiation and supply and require the use of individual monitoring devices by:

- (1) Adults likely to receive, in one year from sources external to the body, a dose in excess of 10 percent of the limits in 10 CFR 20.1201(a);
- (2) Minors and declared pregnant women likely to receive, in one year for sources external to the body, a dose in excess of 10 percent of any of the applicable limits of 10 CFR 20.1207 or 10 CFR 20.1208; and
- (3) Individuals entering a high or very high radiation area.

Technical Specification 6.11.1 required procedures for personnel radiation protection to be prepared consistently with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

The inspector reviewed select aspects of the licensee's dosimetry program to ensure the licensee was meeting the monitoring requirements of 10 CFR Part 20. The inspector requested documentation to support current NVLAP accreditation and was provided a certificate of accreditation issued September 19, 1995 and effective through September 30, 1996. This documentation served to verify that the licensee was in compliance with ANSI-N13.11-1983. During tours of the RadWaste Building, Turbine Building, and Unit 1 and Unit 2 Reactor Containment Buildings, the inspector observed personnel wearing dosimetry devices in accordance with site procedures which require the TLD to be worn on the front side of the body on or above the belt and that Electronic Dosimeters (EDs) be worn between the waist and the neck.

No violations or deviations were identified.

b. Whole Body Exposure

10 CFR 20.1201 (a) requires each licensee to control the occupational dose to individual adults, except for planned special exposures under 20.1206, to the following dose limits:

- (1) An annual limit, which is the more limiting of:
 - (i) The total effective dose equivalent being equal to 5 rems; or
 - (ii) The sum of the deep-dose equivalent and the committed dose equivalent to any individual organ or tissue other than the lens of the eye being equal to 50 rems;
- (2) The annual limits to the lens of the eye, to the skin, and to the extremities, which are:
 - (i) An eye dose equivalent of 15 rems; and
 - (ii) A shallow-dose equivalent of 50 rems to the skin or to any extremity.

At the time of the inspection the licensee's records indicated an actual year to date cumulative personnel exposure for the site of 641.3 person rem which represents 99 percent of the annual exposure projection of 650 person rem. The inspector reviewed with the licensee work remaining in the last six weeks of 1995 with respect to projected doses and determined that the annual exposure goal may be exceeded by approximately 20 person rem due to additional painting work to be completed in 1996. Overall however, the licensee has managed in 1995 to reduce annual personnel exposure significantly from the relatively high 1994 annual personnel exposure of 999.4 person rem.

The licensee reported the following maximum doses in millirem for 1995 through November 17, 1995.

TEDE	Skin	Extremity	Lens-Eye
1571	2361	2831	1544

Through November 17, 1995, the licensee reported 17 intakes during 1995 with a committed effective dose equivalent (CEDE) greater than 5 mrem. The peak CEDE dose during the year to date was 37 mrem.

Through a review of licensee procedures and reported dose information, the inspector concluded the licensee was adequately monitoring and tracking individual occupation radiation exposures in accordance with 10 CFR Part 20 requirements and that all CEDE doses reported were at a small percentage of applicable administrative and regulatory limits.

No violations or deviations were identified.

c. Notices to Workers

10 CFR 19.11(a) and (b) require, in part, that the licensee post current copies of 10 CFR 19, 20, the license, license conditions, documents incorporated into the license, license amendments and operating procedures, or that a licensee post a notice describing these documents and where they may be examined.

10 CFR 19.11(c) and (d) require that a licensee post NRC Form-3, Notice to Employees. Sufficient copies of the required forms are to be posted to permit licensee workers to observe them on their way to or from licensee activity locations.

Coincidental with walkdowns during the inspection, the inspector verified that NRC Form-3's were posted properly at various plant locations permitting worker access. In addition, notices were posted referencing the location where the license, procedures, and supporting documents could be reviewed.

No violations or deviations were identified.

5. Control of Radioactive Material and Contamination, Surveys, and Monitoring (83750)

10 CFR 20.1501(a) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations and (2) are reasonable under the circumstances to evaluate the extent of radiological hazards that may be present.

Technical Specification 6.11.1 requires procedures for personnel radiation be prepared consistently with the requirements of 10 CFR Part 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

a. Radioactive Material Posting and Labeling

10 CFR 20.1904(a) requires, in part, each container of licensed material containing greater than Appendix C quantities to bear a durable, clearly visible label identifying the radioactive contents and which provides sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

During tours of the Unit 1 and Unit 2 Reactor Buildings, Turbine Building, Radioactive Waste Processing Building and various radioactive material storage locations, the inspector independently verified that selected radioactive material areas were appropriately posted and that selected containers were labeled in accordance with regulatory requirements. During the walkdowns, minor variances in posting practices were noted with respect to radioactive material storage areas, but the licensee's procedural requirements were met for the items observed. The inspector interviewed selected workers to ensure licensee personnel were properly trained to understand posting and labeling requirements and the inspector found licensee personnel in each instance to be adequately knowledgeable of requirements in this regard.

No violations or deviations were identified.

b. Personnel and Area Contamination Control

The inspector reviewed selected Personnel Contamination Events and discussed contamination control practices during routine plant operations. During plant tours, the inspector observed generally adequate housekeeping and contamination control practices. The inspector observed handling, packaging, and surveying of contaminated equipment for movement and judged the work controls satisfactory. The licensee had established an annual goal for personnel contamination events (PCEs) for 1995 of 250 PCEs. At the time of the inspection, the licensee had incurred approximately 231 PCEs for 1995, primarily during the Unit 1 outage. Compared with 1994, where the licensee experienced 529 PCEs, also primarily during outages, a favorable trend with significantly reduced PCEs for 1995 will probably be achieved largely through a sitewide increased emphasis on minimizing PCEs.

During the inspection the licensee was experiencing elevated readings of off-gas activity primarily from steam leaks on Unit 2 (as quantified in microcuries/sec. using the sum of six principle noble gases as measured at the Steam Jet Air Ejectors). The licensee's analysis attributes the off-gas problem to an estimated two or three leaking fuel pins which are scheduled for February 1996 replacement during Unit 2 refueling outage. As a result of turbine building steam leaks, the licensee was experiencing an extensive number of airborne (noble gas submersion) contaminated personnel, i.e., the licensee reported to the inspector in excess of 500 personnel were contaminated in a one day period as the personnel exited the south exit RCA. Although off-gas contaminations usually decay rapidly and pose a minimal personnel exposure concern, they can serve to mask true personnel contaminations which should be detected upon exiting the RCA.

In view of this radiological safety concern, the inspector observed personnel processing through the south RCA exit to independently verify adherence with licensee decontamination procedures. Licensee procedure E&RC 0110 "Monitoring Personnel for Contamination", Rev. 19, requires an individual to enter the whole body contamination monitor and alternately monitor both front and back of the body. The procedure states "If contamination is detected, the monitor will alarm and a display will tell the individual where on the body the contamination is located. Since the monitor is sensitive and subject to some false alarms, it may be appropriate for the individual to monitor himself again to confirm the presence of contamination. The individual should note the location of the contamination; if hand or foot, cover with the appropriate covering, and report directly to Personnel decon for decontamination."

Contrary to this procedure, during periods of observation in the area of the south RCA exit, the inspector identified multiple instances of failure to follow E&RC Procedure 0110, Rev. 19, Para. 10.7, in that instances of personnel alarming the contamination monitors were observed without appropriately covering the contaminated hand(s) and/or feet with gloves or booties prior to reporting to the personnel

Enclosure

decon area as required per procedure. Also, personnel at the RCA exit were identified entering the whole body contamination monitor on two consecutive attempts, with alarms on each entry of the worker into the monitor, and then entering the monitor a third time in an attempt to clear the contamination monitor (apparently in the hope that noble gases would have decayed off) in a manner contrary to procedure. Furthermore, during inspector observations in the personnel decontamination area, workers were observed who had alarmed their front and rear torso on the whole body contamination monitor but who, contrary to procedure, later cleared the personnel decon area solely using a "five point" manual partial body frisk (front only). This constituted an inadequate personnel survey contrary to E&RC procedure 110 for release from the RCA in that such frisking practice would not have detected "true" personnel contaminations on the back of the torso had such contamination been present from working in contaminated zones of the power block or elsewhere in the RCA.

Although HP technician coverage in the above mentioned areas was attempting to ensure worker adherence to decontamination procedures, the inspector observed that during shift change periods in particular the level of HP technician coverage provided was insufficient to ensure full procedural adherence given the extensive number of off-gas personnel contaminations being experienced and the variable levels of procedural adherence by workers observed.

The inspector informed licensee representatives that the observed multiple failures of licensee employees to be in full adherence with decontamination and frisking procedures upon exiting the RCA was a violation of licensee procedure E&RC 0110, Revision 19. (NCV 50-324, 325/95-23-01).

Prior to the end of the onsite inspection, the licensee issued an Adverse Condition Report (ACR) requiring corrective action for poor contamination control and frisking practices identified, addressed the issue during morning management meetings, added additional HP technician coverage at the south RCA exit during peak traffic times, and issued a memo to the Brunswick Nuclear Plant Management Team requesting reemphasis with all site personnel on radiological requirements for leaving the radiological control area. On November 20, 1995, the next workday subsequent to the inspection exit, the licensee provided the inspector with an additional, more comprehensive mitigation plan for dealing with the off-gas contaminations and improved adherence to work practices associated with personnel monitoring at the south RCA exit. Corrective actions were initiated during the last day of the inspection and were determined by the inspector to be adequate. These corrective actions included additional HP technician coverage at the RCA exit, rerouting the workforce away from areas of highest personnel concentrations, staggering the arrival/departure of large contractor work groups through the RCA access to reduce numbers of personnel peak exiting the RCA at the same time, utilizing HEPA units, maximizing hydrogen water chemistry to suppress fuel pin leakage, and minimize steam leaks to reduce off-gas concentrations. The inspector informed licensee

Enclosure

representatives that based on their prompt and comprehensive corrective actions, and in accordance with the criteria specified in Section VII.B of the Enforcement Policy, the violation was not being cited.

One Non-cited violation and no deviations were identified.

c. Radiation and High Radiation Area Controls

TS 6.12.1 requires, in part, that each High Radiation Area (HRA) with radiation levels greater than or equal to 100 mRem/hr but less than or equal to 1000 mRem/hr be barricaded and conspicuously posted as an HRA. In addition, any individual or group of individuals permitted to enter such areas are to be provided with or accompanied by a radiation monitoring device which continuously indicates the radiation dose rate in the area or a radiation monitoring device which continuously integrates the dose rate in the area, or an individual qualified in radiation protection procedures with a radiation dose rate monitoring device.

10 CFR 20.1003 defines a radiation area as "an area, accessible to individuals, in which radiation levels could result in an individual receiving a dose equivalent in excess of 5 millirem in 1 hour at 30 centimeters from the radiation source or from any surface that radiation penetrates."

10 CFR 20.1902 (a) requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "CAUTION, RADIATION AREA."

During tours of the Unit 1 and Unit 2 Reactor Building, Turbine Building, and Radioactive Waste Processing Building, the inspector noted that all HRAs and locked HRAs inspected were locked and/or posted, as required. During the facility tour the inspector verified that personnel inside the RCA, and particularly those personnel observed entering high radiation areas, were properly logged in on RWPs and were wearing the proper dosimetry devices in a correct manner.

During facility tours, the inspector observed on the Unit 2 Reactor Building 80' West Elevation several supplemental spent fuel pool cooling pipes in a pile that were readily accessible to those personnel either working in the area or in transit through the area. The pipes were roped off with a plain white rope and a sign indicating in progress work and were not radiologically controlled. The licensee indicated in response to the inspector's questions that the pipes had been stored in the area for the prior two weeks which was later verified based on a rad survey dated November 2, 1995. Upon radiation survey, the pipes were determined to be at various points generating dose rates at a level of 30 mrem/hr. at 30 cm. (Approximately 70 mrem/hr. on contact) which, in accordance with procedure E&RC-250, "Posting of Areas/Materials", Rev. 23, Para. 10.1.2., should have been identified with a sign warning of the condition. Licensee procedure

E&RC-250 requires, in Para. 10.1.1, that each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "CAUTION, RADIATION AREA". 10 CFR 20.1003 defines a radiation area as an area accessible to individuals in which radiation levels could result in a individual receiving a dose equivalent in excess of 5 millirem in 1 hour at 30 centimeters from the radiation source. 10 CFR 20.1902 (a) states that the licensee shall post each radiation area with a conspicuous sign bearing the radiation symbol and the words "Caution, Radiation Area".

Contrary to these requirements, the inspector noted the area was not posted as a radiation area. Upon further discussion the licensee indicated that the entrance to the larger reactor building was in fact posted as a radiation area and stated this posting was applicable to the building as a whole. In response, the inspector informed the licensee that posting practices must adequately alert personnel to the presence of radiation areas such that they may minimize exposures and that the absence of the required posting in the area constituted an violation of 10 CFR 20.1902(a) requirements (NCV 50-324, 50-325/95-23-02). Further information on the NRC position in this regard is provided in NUREG/CR 5569, Revision 1, which states: "The practice of posting only the entrances to a 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..... Posting the entrance to a 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. Posting just the entrances to the reactor building does not meet the intent of the regulations." (Regulatory reference: Health Physics Position 036, PDR-9111210167, NUREG/CR 5569, Revision 1).

Once informed of the violation, the licensee initiated prompt corrective action to post the area as a radiation area. The inspector informed licensee representatives that due to their prompt corrective action and the low safety significance of the issue identified, based on the relatively low probability of personnel incurring significant doses in the immediate area of the pipes, the criteria specified in Section VII.B of the Enforcement Policy were met and therefore the violation was not being cited.

One Non-Cited Violation and no deviations were identified.

d. Radiation Detection and Survey Instrumentation

The inspector reviewed the plant procedure which established the licensee's radiological survey and monitoring program and verified that the procedures were consistent with regulations, TSs, and good HP practices. During facility tours, the inspector observed health physics personnel operating survey instruments during the performance of radiation and contamination surveys. The inspector noted that survey instrumentation and continuous air monitors in use within the RCA were operable and displayed current calibration stickers. The inspector further noted an adequate number of survey instruments were

available for use and background radiation levels at personnel survey locations were observed to be within the licensee's procedural limit of 300 counts per minute.

No violations or deviations were identified.

6. Programs for Maintaining Exposures As Low As Reasonably Achievable (83750)

10 CFR 20.1101(b) states that the licensee shall use, to the extent practical, procedures and engineering controls based upon sound radiation protection procedures to achieve occupational doses to members of the public that are as low as reasonably achievable (ALARA).

Regulatory Guides 8.8 and 8.10 provide information relevant to attaining goals and objectives for planning and operating light water reactors and provide a general philosophy acceptable to the NRC as a necessary basis for a program of maintaining occupational exposures ALARA.

During the inspection, the inspector reviewed and discussed with cognizant licensee representatives ALARA program initiatives, In-progress ALARA evaluations, and ALARA planning for high dose jobs during the upcoming Unit 2 outage in February 1996. The inspector discussed with licensee representatives ALARA planning and preparation which included HP staffing, equipment, dose reduction methods to be employed, decontamination efforts, and work scope sequencing. The inspector observed an ALARA committee meeting at which time the various unit managers negotiated dose goals for upcoming work. The inspector noted that managers were taking "ownership" for the ALARA program with respect to self imposing ALARA goals that appeared aggressive compared with earlier comparable work evolutions. The inspector requested and the licensee provided a list of the fifteen highest dose projects since September 1994. The inspector reviewed selected ALARA work plans developed for several of the higher dose jobs. The plans addressed general information concerning the project, past dose performance data, projected dose estimates and goals, ALARA considerations and radiological controls included in the scope of activities, improved ALARA job planning, and increased emphasis on worker efficiency in radiation areas. The inspector determined that the ALARA work plans included appropriate information for planning work and implementing ALARA measures. However, review of individual project dose performance, indicated continued opportunity for ALARA improvement in that eight of the twelve projects reviewed exceeded dose goals, some by as much as 200 percent. The licensee has made significant progress in reducing actual personnel exposure during 1995, however, compared to prior years. The licensee currently projects that exposure for the year will exceed the annual goal of 650 rem by approximately 20 person rem based on actual exposure through November 17, 1995, and work projected to year end.

The reduction of source term within the primary reactor system and associated piping remains the most significant challenge to the site's ALARA program with stellite removal (as well as removal of other high cobalt alloys) remaining as an area with significant dose reduction potential. Progress in stellite reduction was made during recent outages with replacement of control rod blades with stellite content. The licensee

Enclosure

has undertaken numerous ALARA initiatives that are resulting in reduced site dose. Equipment upgrades include remote video surveillance, use of robotics, uses of telemetry for remote monitoring of personnel, enhanced mockup training, and a surrogate tour video system. Numerous process improvements have been undertaken with positive ALARA results. Source term reduction initiatives included RHR chemical decon, hot spot removal, and check valve replacements. Overall the inspector observed an increasingly effective ALARA program that contributed significantly to the reduced personnel exposures being realized at the site during the year to date.

No violations or deviations were identified.

7. Exit Meeting (83750) (92702)

The inspector met with licensee representatives indicated in Paragraph 1 at the conclusion of the inspection on November 17, 1995. The inspector summarized the scope and findings of the inspection. Information with respect to proprietary documents or processes is not included in this report. Dissenting comments were not received from the licensee.

<u>Item Number</u>	<u>Status</u>	<u>Description and Reference</u>
50-325, 324/95-23-01	Closed	NCV - Failure of personnel to properly follow decontamination procedures upon exiting the RCA as required by TS 6.11 and licensee procedure E&RC 0110, Rev. 19. (Paragraph 5.b.)
50-325, 324/95-23-02	Closed	NCV - Failure to post a radiation area in accordance with 10 CFR 20.1902 in order to adequately inform workers of radiological hazards in their work areas. (Paragraph 5.c.)