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M. J. COONEY
MANAGER
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ELECTRIC PRODUCTION DEPARTMENT

August 10, 1984

Docket Nos. 50-277
50-278

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:

Your letter dated July 2, 1984, forwarded Combined Inspection Report 50-277/84-15 and 50-278/84-13. Appendix A of your letter addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below along with our response.

Technical Specification 6.8 and Regulatory Guide 1.33 (November 1972) require implementation of procedures for control of radioactivity. Procedure HPO/CO-100, Revision 13, April 25, 1983, Health Physics Guides Used in the Control of Exposure to Radioactive Material, requires posting, with "Contaminated Area" signs or a radiation tape barrier line, of areas having removable surface contamination above 1000 disintegrations per minute per 100 square centimeters (dpm/100 cm²).

Contrary to the above, on May 16, 1984, three fire barrier seals in the Reactor Building 165-foot elevation had removable surface contamination of 1700 to 23,000 dpm/100 cm² and were not posted with "Contaminated Area" signs or a radiation tape barrier line.

This is a Severity Level IV Violation (Supplement IV) applicable to DPR-44.

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Response

Investigation determined that this violation apparently occurred because Health Physics personnel, performing a general area survey, neglected to smear several fire barrier seals.

Representative smears of surfaces are necessarily used to monitor areas and equipment for loose surface contamination. During general area surveys, these representative smears are normally taken from areas where plant personnel are inclined to walk or touch. Consequently, the representative smear area is relatively small in comparison to the large surfaces.

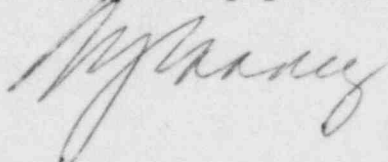
Because of this large surface area to smear area ratio, and because personnel would not normally access the seals in question, Health Physics personnel did not smear sample these particular seals during their general area survey.

Health Physics personnel have now been made aware that the fire barrier seal material may accumulate contamination and that the seals should be considered potential contamination problems. On May 23, 1984, Health Physics personnel were instructed during a weekly meeting to increase their surveillance of fire barrier seals and other relatively inaccessible areas during general area surveys. Fire barrier seal surveys have been re-emphasized during weekly meetings since then as a reminder to prevent the recurrence of a similar violation.

The ten-day delay of this response was discussed with Robert M. Gallo of your staff and found acceptable. We regret any inconvenience this late submittal may have caused.

If you require additional information, do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. Starostecki", is written over the typed name.

cc: Mr. A. R. Blough, Site Inspector