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August 31, 1984

Docket No. 50-277

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

Dear Mr. Martin:

Your letter of August 3, 1984, forwarded Inspection Report 50-277/84-18. Appendix A addresses two items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are restated below along with our response.

- A. Technical Specification 6.4, "Training", requires, in part, training program for the facility staff meeting the requirements of Section 5.5 of ANSI N18.1-1971. Section 5.5 of ANSI N18.1 requires, in part, special training sessions for replacement personnel. A training program shall be established which maintains the proficiency of the operating organization by periodic training exercises, instruction periods and special training sessions.

Contrary to these requirements, licensee's Procedure No. HPO/CO-80, used to train and qualify contractor-supplied Health Physics Technicians assigned to pipe replacement, did not include four approved radiation exposure control procedures developed specifically for pipe replacement. These Health Physics Technicians were responsible for implementing these radiation exposure control procedures.

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

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Response

At the time the training for contractor Health Physics Technicians was administered in accordance with Procedure HPO/CO-80, "Non-PECO Health Physics Technician Entry Procedure", Rev. 3, approved copies of procedures HPO/CO-501, "Requests for ALARA Reviews", Rev. 1, and HPO/CO-503, "ALARA Pre-Lab Review", Rev. 0, had not yet been distributed to the appropriate training personnel. During this training, the technicians received training in draft versions of HPO/CO-501 and HPO/CO-503 which were included in the lesson plan.

A training session will be conducted for the contractor Health Physics Technicians who did not receive training in the approved procedures HPO/CO-501 and HPO/CO-503 and will be documented on the HP Technician Training Qualification Record of HPO/CO-80. This training will be completed by September 14, 1984.

Following this inspection, the Chicago Bridge and Iron ALARA Administrator for pipe replacement activities instructed contractor Health Physics personnel on the content of ALARA Program Instruction No. 1, "General Program Instruction for Maintaining Occupational Exposure to Radiation As Low As Is Reasonably Achievable (ALARA)" and ALARA Program Instruction No. 2, "Specific Program Instruction for Maintaining Occupational Exposure to Radiation As Low As Is Reasonably Achievable (ALARA)".

This training was accomplished by distributing an instruction manual to the contractor Health Physics technicians for their review prior to conducting a classroom session on these procedures. A test was administered to the technicians prior to the start of the classroom session and evaluation of the performance of the technicians in the quiz and classroom discussion is documented and maintained by the Peach Bottom Support Health Physicist.

Procedure HPO/CO-80 will be revised to include procedures HPO/CO-501 and HPO/CO-503. Additionally, it will be revised so that the Peach Bottom Support Health Physicist may specify unique training requirements for contractor prepared Health Physics procedures to be utilized at Peach Bottom for special jobs. It is expected that the revision to HPO/CO-80 will be completed by October 1, 1984.

- B. Technical Specification 6.11, "Radiation Protection Program," requires, in part, adherence to procedures for personnel radiation protection. Licensee's Procedure No. HPO/CO-4

requires, in part, a radiation work permit containing specific requirements for radiological exposure controls.

Contrary to the above, on several occasions during May and June 1984, Radiation Work Permit No. 2-94-0290, "Unit 2 Drywell, Pre-Decon Work, " was used for the removal of hydraulic snubbers by contractor personnel and did not provide specific radiological exposure contro. .

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

Response

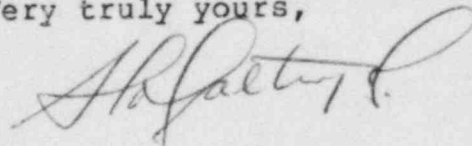
Radiation Work Permit (RWP) No. 2-94-0290 was prepared to cover all contractor pre-decontamination work in the Unit 2 drywell. This included removal of 25 snubbers to facilitate pipe replacement.

The use of this single RWP for predecontamination activities in the drywell did not provide for specific radiological controls due to the large variance of radiological conditions throughout the drywell during this phase of work. Therefore, Health Physics Technicians were required to provide the specific radiological controls for each task to be performed.

As a result of this Inspection Report, use of the single RWP for the pre-decontamination tasks was terminated on June 21, 1984. In accordance with Health Physics procedure HPO/CO-4, "Radiation Work Permits," specific RWP's were prepared for each task to be performed prior to pipe decontamination which contained survey data and radiological exposure controls unique to each task which was performed.

Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



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