December 1, 1983

Note to Ron Hernan

SUBJECT: CRYSTAL RIVER 3 HIGH RADIATION AREA (839 743)

You can put out the notice of proposed determination in roughly the form you have it but you should delete the reference to 20.203 suggesting that a conspicuous or visible alarm supports this proposition. If you simply delete that reference, you can put it out as a notice of proposed. The reason that I suggest you delete that reference is, I don't agree that what the licensee wishes to do is consistent with 20.203. When it comes around to time for acting on this determination, you have to answer the question of whether it conforms with what 20.203 requires. I'm not sure that the roped-off area with the flashing light is adequate to satisfy 20.203 which calls for high radiation areas to have: (a) a device which causes the levels of radiation to be reduced to low levels; or, (b) is "equipped with a control device which shall energize a conspicuous visible or audible alarm" such that the individual entering the high radiation area is made aware of the entry; or, (c) is under locked entry. I'm not sure that ropes and a flashing light constitute a control device which energizes a conspicuous visible or audible alarm, etc.

Zor Joe Scinto