

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-247/84-22

Docket No. 50-247

License No. DPR-26 Priority -- Category --

Licensee: Consolidated Edison Company

4 Irving Place

New York, New York 10003

Facility Name: Indian Point, Unit 2

Inspection At: Buchanan, New York

Inspection Conducted: August 16-17, 1984

Inspectors: P. Clemons
P. Clemons, Radiation Specialist

9/21/84
date

Approved by: M. Shanbaky
M. Shanbaky, Chief, Facilities
Radiation Protection Section,
Radiation Protection Branch

9/21/84
date

Inspection Summary: Inspection on August 16-17, 1984 (Report No. 50-247/84-22)

Areas Inspected: Routine unannounced inspection of the licensee's Radiation Protection Program to review certain aspects of the radiation protection upgrading program and to review the circumstances surrounding the unplanned exposure of a worker on August 7, 1984. The inspection involved 25 inspector hours onsite by two regional based inspectors.

Results: One violation was identified (failure to follow procedures, paragraph 3).

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DETAILS1. Persons Contacted1.1 Licensee Personnel

C. Jackson, Vice-President, Nuclear Power
A. Budnick, Manager, Nuclear Power, Quality Assurance
M. Blatt, Director, Regulatory Affairs
M. Miele, General Manager, Environmental Health and Safety
J. Cullen, Radiological Assessor
W. Graber, Radiation Protection Manager
J. Ellwanger, Licensing Engineer
J. Quirk, Test and Performance Engineer

1.2 NRC Personnel

M. Shanbaky, Chief, Facilities Radiation Protection Section

Other licensee and contractor personnel were contacted and interviewed during the inspection.

2. Purpose

The purpose of this routine inspection was to review the licensee's radiation protection program with respect to the following elements:

- Procedures - "Steam Generator Channel Head Entry"; and
- Certain aspects of the radiation protection program upgrade.

3. Procedures

The adequacy and effectiveness of the licensee's procedures were reviewed against the criteria contained in Technical Specification 6.11, "Radiation Protection Program". The licensee performance relative to these criteria was determined by interviewing the General Manager, Environmental Health and Safety and the Radiation Protection Manager, and by reviewing procedures and other appropriate documents.

Within the scope of this review, the following violation was identified:

Technical specification 6.11, "Radiation Protection Program", states that "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure".

Procedure No. EHS 3.403, Revision 0, "Steam Generator Channel Head Entry", developed pursuant to the above, requires that an SAO-134 be prepared for the entry of personnel into the Steam Generators. The SAO-134 prepared for the Steam Generator entry on August 7, 1984, required that self reading dosimeters be worn on the head, chest and the upper arms, and the highest reading on these dosimeters be used in controlling the worker's whole body exposure.

It was determined that on August 7, 1984, a worker was working on a steam generator. The worker was standing at the manway of one of the steam generators with his arms and portions of his upper body located inside the steam generator. The radiation dose rate at the steam generator manway was 10-15 R/hour and as high as 30 R/hr inside the steam generator. Although the worker's exposure was being controlled by a Radiation Protection Technician, the technician did not read all the self reading dosimeters located on the worker (upper arms, head and chest). He used the data indicated by the dosimeters located on the head and chest, but he did not use the highest dosimeter value (the upper arms in this case) to control the worker stay time in the steam generator and to limit the worker exposure as required by Procedure No. EHS3.403.

The failure to follow procedures represents a violation of Technical Specification 6.11 (84-22-01).

4. Upgrade Program

During the management meeting held with licensee representatives on July 18, 1984, the licensee provided the Commission with a general schedule for upgrading the radiological protection plan. During this inspection the inspector specifically reviewed the schedule for upgrading the Radiation Protection Manual.

The licensee has developed a detailed schedule which states that the Radiation Protection Manual will be completed by the end of October 1984.

This commitment will be reviewed during a subsequent inspection (84-22-02).

5. Exit Interview

The inspector met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on August 17, 1984. The inspector summarized the scope of the inspection and the findings.

At no time during this inspection was written material provided to the licensee by the inspector.