

ENCLOSURE 1

Description of Violations

Jersey Central Power and Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960
Docket No. 50-219

Certain activities under your license appear to be in violation of AEC requirements. These apparent violations are considered to be of Category II severity.

1. 10 CFR 20.203(b), "Caution signs, labels, signals, and controls," requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words, "Caution - Radiation Area." A "Radiation Area" is defined in Part 20 as any area accessible to personnel in which radiation exists, originating in whole or in part within licensed material, at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirems, or in any five consecutive days a dose in excess of 100 millirems.

Contrary to this requirement, radiation levels greater than 5 milli roentgens per hour existed for periods of greater than one hour in the Radwaste Facility Control Room on September 5, 1973 which was not posted with the required sign. We note that this is a recurring item. It was identified as Item 5.a. and 5.b., Enclosure 1 of our letter dated March 7, 1973.

2. 10 CFR 20.206(a) "Instruction of Personnel..." (Replaced by 10 CFR 19.12, "Instructions to workers" on September 17, 1973); requires, in part, that individuals working in a restricted area be instructed in the safety problems associated with exposure to such materials or radiation as may be found in the area and in precautions or procedures to minimize exposure.

Contrary to this requirement, on September 5, 1973 two individuals in the Radwaste Facility Control Room were not aware of the 5 milli-roentgen per hour dose rates in their work area. We note that this is a recurring item. It was identified as Item 3, Enclosure 1 of our letter dated March 7, 1973.

3. Technical Specification 6.2.C states that standing instructions to the operating staff shall require that procedures defined in 6.2.B are to be followed in conducting activities identified therein. The subject procedures are contained in Section 900, Oyster Creek Nuclear Electric Generating Station, Procedures Manual. Section 901 requires that individuals be familiar with procedures and shall follow them at all times. Section 903.7.1 requires that each Radioactive Work Permit will provide a description of the hazards involved. Section 903.9.7 requires that notification of overexposures will be given to the Plant Operating Review Committee (PORC).

Contrary to the above, requirements of these procedures were not fulfilled as noted below:

- a. On September 15, 1973, the inspectors observed four employees working at the 95 foot elevation of the reactor building. They were not wearing protective clothing as prescribed by Radioactive Work Permit 657-73, dated August 29, 1973.
 - b. The radioactive Work Permit covering the removal of radioactive materials from the roof of the Radwaste Facility on August 24, 1973 did not provide a description of the hazards involved.
 - c. There is no documentation existing that indicates that the PORC was notified or acted upon a personnel overexposure that occurred in April 1973.
4. Technical Specification 6.1.C.2.f. requires that the minutes of the General Operating Review Board (GORB) meetings be provided to the Plant Superintendent.

Contrary to this requirement, minutes of GORB meetings conducted after January 25, 1973 had not been provided.

5. Technical specification 6.1.C.2.d.(4) requires that the GORB conduct periodic audits of plant operations at least quarterly.

Contrary to this requirement, audits were not conducted at the required frequency.

OFFICE ▶					
SURNAME ▶					
DATE ▶					

6. Technical Specifications 6.1.C.1.d.(1). and 6.2.F. require that proposed changes and temporary changes to procedures be promptly reviewed and approved by the PORC and the Station Superintendent.

Contrary to this requirement temporary changes to Procedure 903.2 were made on March 30 and April 10, 1973 which were not reviewed and approved as of September 7, 1973.

ENCLOSURE 2

Description of Safety Items

Jersey Central Power and Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960
Docket No. 50-219

Certain items appear to raise questions concerning the safety of operations as identified below:

1. Prudent practice dictates that to protect health and safety, Management must have adequate staff and sufficient control to; assure that a satisfactory health and safety program is developed and maintained, provide audits of this program's quality and effectiveness and enforce procedures to assure that employees understand radiation hazards and work in accord with procedures provided for their protection.

Contrary to the above, the following deficiencies were observed during the inspection of your facility and safety program records:

- a. In response to our observation at a previous inspection that your radiation protection staff was not sufficient, your letter, dated March 28, 1973, stated, "This area is receiving our most immediate attention." We note that at the time of the inspection, the only permanent addition you had made was the addition of a single Assistant Radiation Protection Technician. We understand that you have since filled the position of Supervisor of Radiation Protection and have indicated that two new Radiation Protection Foremen will be working in presently vacant positions by the end of November 1973. We note that one more Radiation Protection Technician and two more Assistant Radiation Protection Technicians are still to be hired.
- b. Administrative controls which include internal audits of radiological practices and problem areas, including violations of plant procedures and AEC regulations have been implemented. Although some of these audits and inspections are identifying problem areas and violations, they have not been effective in preventing recurrences of problems and violations of the same type.

Approved by HQ (Gen. King)
10/24/74 JRM

- c. Station Radiation Protection Procedures, Section 900, require that employees follow radiation safety rules and practices; however, in spite of repeated examples of employees failure to follow these rules, your program does not provide plant management with assurance that individuals are fulfilling this obligation. We note that this is a recurring item. It was identified as Item 1.2, Enclosure 2 of our letter dated March 7, 1973.
- d. Management controls relative to disciplinary action against employees observed violating plant procedures are minimal. The plant management does not appear to be exercising the control necessary to require compliance with radiation protection procedures.
- e. Responsibilities of the PORC, as defined in the Technical Specifications, include the review of radiation protection problem areas, exposure control and housekeeping activities. A review of the minutes of PORC meetings for the last 5 months revealed no case where these matters were considered by the committee.
- f. A procedure was not provided for the removal and disposal of contaminated filter elements from the Radwaste System in which radiation levels up to 3 roentgens per hour existed. This operation was performed on August 24, 1973 and resulted in a radioactive spill.
- g. Personnel working in the Control Room portion of the Radwaste Facility were unaware that they were in a Radiation Area. A foreman in the same area was also unaware of radiation levels in the small pump room. These personnel had not received proper instruction in radiation levels inherent in their work areas. (This matter is referred to in Item 2 of the description of violations.)