

Jersey Central Power & Light Company

MADISON AVENUE AT PUNCH BOWL ROAD • MORRISTOWN, N. J. 07960 • 539-6111

March 28, 1973

Mr. James P. O'Reilly, Director
Directorate of Regulatory Operations, Region 1
United States Atomic Energy Commission
970 Broad Street
Newark, New Jersey 07102

Dear Mr. O'Reilly:

This letter is in reply to your letter of March 7, 1973 to Mr. R. H. Sims regarding the special inspection conducted by Mr. Meyer and Mr. Cantrell on February 13 through 16, 1973.

In response to the concerns identified in your letter and in Enclosure No. 2 regarding actions taken or planned to improve the effectiveness of our management control system, we wish to advise you of the following activities:

Radiation Management Corporation is reviewing our existing radiological program and will make recommendations which will improve and strengthen it. In conjunction with the above, they will also be undertaking a complete review and will rewrite, as necessary, our radiation protection procedures. Their services will then continue to be utilized to provide routine refresher training for radiation protection personnel and also to audit our effectiveness in implementing our program.

Since plant startup, additions have been made at the technician level in our health physics organization to ensure adequate personnel to conduct our radiological program. Due to the additional supervisory load this produced in addition to the growth in health physics data compilation and reporting requirements, it has become apparent that we may have weakened our supervisory function. To correct this situation, we are making the following organizational changes:

A Supervisor of Radiation Protection will be added to the staff to report directly to the station superintendent. He will have overall responsibility for the station's radiation protection program. To strengthen the direct supervision of the radiation technician group, a second radiation protection supervisor, also reporting to the Supervisor of Radiation Protection, will be added to the plant organization. Finally, an engineering aide is scheduled to be added to report to the Supervisor of Radiation Protection to enable the necessary data compilation and reporting requirements to be satisfied without detracting from our direct supervision efforts.

Upon effecting the above plan, we are certain the deficiencies observed during your inspection will no longer exist. It is difficult to state exactly when all these activities will be accomplished; therefore, we would like to offer our assurance that this area is receiving our most immediate attention. Radiation Management Corporation has already started their review. Interviews are now being conducted with potential candidates for the expanded radiation protection organization. It is our intention to add the individuals to the plant staff as rapidly as possible. A Technical Specification change will be submitted to reflect this organizational adjustment.

In connection with Item No. 1 of the enclosure to your letter, as stated in our letter of March 27, 1973, controls will be established during those times when surveys indicate the requirements of 10CFR20.105(b) may be violated such as those which could occur during radwaste drum shipments. This will insure full compliance being achieved on this item. In addition, to prevent a reoccurrence of this type of violation, we intend to investigate the extension of the plant perimeter fencing to a greater distance from the facility than that which presently exists.

In response to Item No. 2, the source of the radiation referred to in this item has been removed to the radwaste storage area. The requirement for personnel monitoring for individuals working within station restricted areas has been reviewed with all station personnel. The individual responsible for authorizing such individuals to be in station restricted areas is also responsible for ensuring that they possess the required dosimetry. Full compliance will thus be maintained with the regulations.

In connection with Item No. 3 of the enclosure to your letter, the 55-gallon drum on the 23-foot elevation of the reactor building causing the radiation level noted was removed to the radwaste facility storage area. Those individuals responsible for surveying and postings within restricted areas have been refamiliarized with 10CFR20 posting requirements. Full compliance has been achieved on this item.

In connection with Item No. 4 a, b, and c of the enclosure to your letter, all areas noted are now properly posted. The waste drums in the reactor building have either been removed to the radwaste storage area or the areas surrounding them have been properly barricaded and posted. The locked door criteria remains as an open item. A special survey has been conducted and a determination made as to those doors which will require locking under our present operating conditions. Those doors which presently contain the appropriate hardware to facilitate locking have been locked. Doors which cannot be locked have been posted so as to require a shift foreman or the radiation protection supervisor's permission in order to gain entry. Full compliance will be achieved as soon as proper locking devices can be procured and installed.

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In connection with Item No. 5 a of the enclosure to your letter, all the drums noted in this paragraph have either been snipped off site or have been removed to a shielded storage area. With regard to the areas noted in Item No. 5 b of the enclosure, these areas are now posted in accordance with requirements of 10CFR20.203(b). To prevent reoccurrence of the items noted under Item No. 5, all radioactive waste drums will be stored in appropriate areas inside the facility. In addition, a survey schedule is being developed to insure general area surveys being performed at a frequency sufficient to maintain proper postings in all areas of the station. Full compliance has been achieved.

In connection with Item No. 6 a of the enclosure to your letter, the drums of concern have been removed to the radwaste storage facility and the fiberglass tanks have been appropriately labeled. Full compliance has been achieved. To prevent a reoccurrence of violations of this nature, the posting and labeling requirements, as identified in 10CFR20, are being reviewed with those responsible for radiation protection at the site.

In response to Item No. 7, the doors to the radwaste building are now conspicuously posted with "Caution-Radioactive Material" signs. Full compliance has been achieved. As noted above, posting requirements of 10CFR20 have been reviewed with radiation protection personnel at the site.

In connection with Item No. 8 of the enclosure to your letter, a schedule providing general surveys of the various plant areas is being developed to ensure adequate routine surveys are accomplished. This will ensure future compliance in this area. In addition, we are investigating the purchase of additional portable surveying equipment with recording ability to monitor areas that may be subject to frequent changes. Data from such survey equipment could be used to assist in developing adequate survey frequency.

In response to Item No. 9, the drums noted have been shipped off site thus full compliance has been achieved. To prevent a possible reoccurrence, our procedures will be modified to reflect current station requirements pertaining to storage of drummed radioactive waste. Such changes will require all drum storage to be inside the facility but will recognize the need to store a large quantity of low level waste collected during a plant outage in appropriate areas of the turbine or reactor buildings. Such areas will be properly identified and posted in accordance with the applicable regulations.

In response to Item No. 10, both the FDSAR Section IX, Sub-section 3.1.1 and our letter dated December 12, 1972 intended to acknowledge that potentially radioactive waste would be collected. In recognition of our effort to maximize the use of our radwaste equipment to minimize releases, it is not our intention to process

water that does not normally contain any radioactivity such as rain water which is currently collected in this outside catch basin. We would intend to permit rain water to collect in this basin area and after sampling for radioactivity released without processing. However, since the possibility of the catch basin overflowing exists, should the present drain arrangement freeze, we propose to extend the drain with a removable section of pipe in such a way that it will normally act as a plug permitting our sampling and release as outlined above. This extension will be of such a height that before the basin could overflow, the water collected therein will flow over the pipe and into the 1-9 radwaste sump. This solution we believe best serves all concerns in this matter. This plan should be accomplished within the next thirty days.

The following are responses to questions raised in Enclosure No. 2 to your letter:

- 1a. Station radiation protection procedures, Section 901, states, "It shall be the responsibility of all station supervisors to see that all radiological safety rules and procedures are followed, that work involving radiation is performed in a safe and approved manner within his area of responsibility.....". The requirements of this procedure, in addition to standard health physics rules and work practices, will be emphasized during the retraining lectures. Supervisory responsibilities in connection with radiation protection will be stressed as required to insure compliance with the procedure.
- 1b. A program has been established wherein supervisory personnel will conduct inspections on a regular basis and convey their findings to the appropriate member of the staff who will then initiate corrective action if required.
- 1c. A continuous radiological protection training program for plant personnel is currently in the process of being established through the use of monthly safety meetings. Radiation protection fundamentals and procedures will be emphasized at these meetings.

The radiation technicians in the performance of their duties are responsible for implementation of radiation protection instructions and procedures. These instructions and procedures are based on 10CFR20 with regard to practices, limits, and conduct of operation. The requirements, as delineated in 10CFR20, will be stressed with the present radiation technicians in a review program and have been incorporated into the qualification program for any additional radiation technicians.
- 1d. A standing order has been issued to the effect that routine inspections will be made each shift to detect leakage, open tank hatches, and overflows. Any discrepancies will be reported to supervision who will take appropriate action. An emergency procedure to cover the

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the deficiency cited is being developed. Such leakage does not present any radiological hazards that have not been previously evaluated in our docket.

- 1e. The drums in question have been removed to the radwaste facility and all postings reviewed for accuracy. Extended radiation work permits are required to be reviewed and reissued on a monthly basis as per radiation protection procedures and this requirement will continue to be enforced.
- 1f. Radiation instruments are available to the shift foreman for use by his shift personnel and other personnel at the station during other than normal working hours. The waste drum capper is now operational; therefore, manual capping is not necessary. If, in the future, it becomes necessary for manual capping to be performed, a survey will be made as required.
- 2a. All waste drums referred to in this enclosure have been removed or properly barricaded and posted. Complete surveys have been conducted to assure that waste drums are not located in an area which might contribute unknowingly to personnel exposure.

The floor of the large pump room in the radwaste building, although contaminated, is not the major source of the observed radiation levels. A radwaste modification study is in progress with one of its main goals being a reduction in personnel exposure. In addition, plans are underway to contract certain decontamination activities to outside organizations.

General housekeeping has been a continuing problem at the facility and, as mentioned, plans have been initiated to contract outside services in an effort to decontaminate and clean up the plant.

- 2b. The program for removal of radioactive waste drums has been accelerated. Two firms are being used to expedite shipments and, in addition, another contract is being issued for the purpose of decontaminating the drums that are backlogged in the radwaste facility. This effort will result in complete removal of the radwaste drum inventory.

Very truly yours,



Donald A. Ross
Manager, Nuclear Generating Stations

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