



Consumers
Power
Company

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December 21, 1984

James G Keppler, Administrator
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - RESPONSE TO IE INSPECTION REPORT 84-22

One item of noncompliance was identified in IE Inspection Report 50-255/84-22 dated November 21, 1984. Our response to this item of noncompliance follows:

1. NONCOMPLIANCE 50-255/84-22-02

Technical Specification 6.11.1 states that procedures for 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 radiation exposures.

- a. Procedure No. HP 2.17, "Radiological Survey Requirements", states that air samples be taken in occupied areas where surface contamination levels exceed 25,000 dpm/100 cm² and Procedure No. HP 2.19, "Airborne Radioactivity Sampling", requires air sampling during entries into known or suspected airborne radioactivity areas and for operations likely to cause airborne radioactivity.

Contrary to the above, on October 9, 1984, no air samples were taken during the first attempt at removal of the lower wear ring of primary coolant pump P50C. This operation involved work on highly contaminated equipment (1E+6 dpm/100 cm²) that could reasonably result in airborne radioactivity.

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- b. Procedure HP 7.0, "Respiratory Protection Program", states that a qualitative field fit test shall be performed to ensure an adequate fit prior to entering the hazardous area and that protective headgear not interfere with the respirator sealing surface.

Contrary to the above, on October 9, 1984, two workers who were observed donning their full face respirators over their antiC hoods failed to perform the required field fit test, and it was observed that one worker's hood interfered with the respirator sealing surface.

- c. Administrative Procedure 7.04, "Radiation Dosimetry", states that the primary TLD be worn on the frontal trunk of the body between the neck and the waist and within three inches of other whole body monitoring devices, unless directed otherwise by radiation safety personnel. Workers are informed of this requirement when they are issued their primary TLD.

Contrary to the above, many workers, including radiation safety personnel were observed wearing their primary TLD below the waist by suspending it from their belt or belt loop at the hip.

- d. Procedure No HP. 2.19, "Airborne Radioactivity Sampling", states that approximately ten percent of all particulate air samples showing beta-gamma activity should be screened for alpha activity.

Contrary to the above, during the period September 17 through October 5, 1984, only about one percent of the air samples collected on the 649' elevation of the containment were counted for alpha activity. Also, during January and February none of the air samples taken in the refueling cavity area and only about one percent of those taken in the spent fuel pool area were counted for alpha activity.

Item (a) Response

Corrective Actions Taken and Results Achieved

Although air samples were not taken prior to the initiation of the repair activity, the appropriate samples were obtained as the work progressed. Evaluation of the air samples obtained in the area indicate that airborne radioactivity levels were within limits during the unmonitored time period.

Corrective Action to be Taken to Avoid Further Noncompliance

Health Physics personnel will be directed to ensure that all appropriate radiological precautions are observed prior to the initiation of a work activity.

In addition, health physics technicians will be instructed to assert the authority provided to them and, and when necessary, secure work until all appropriate radiological precautions have been completed.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by February 10, 1985.

Item (b) Response:

Corrective Actions Taken and Results Achieved

Plant personnel have been directed to ensure that a qualitative field fit test is performed prior to each use of a respirator.

Corrective Action Taken to Avoid Further Noncompliance

The requirements to perform a qualitative field fit test and to ensure that materials do not interfere with the respirator seal will be posted at the access control respiratory equipment supply area. Training department lesson plans will be revised to ensure compliance with respirator donning requirements.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by April 15, 1985.

Item (c) Response:

Corrective Actions Taken and Results Achieved

The requirements of Administrative Procedure 7.04, "Radiation Dosimetry", were reviewed and determined to be excessively restrictive. The trunk of the body may be defined as the area between the neck and the groin. Consequently, corrective action to prevent personnel from placing dosimetry on a belt or belt loop is not necessary.

Corrective Action to be Taken to Avoid Further Noncompliance

Administrative Procedure 7.04, "Radiation Dosimetry", will be revised to allow dosimetry to be located between the neck and groin on the frontal trunk of the body. Plant personnel will be informed of the proper method of dosimetry placement instituted by the revised procedure.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by April 15, 1985.

Item (d) Response:

Corrective Actions Taken and Results Achieved

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Palisades Plant
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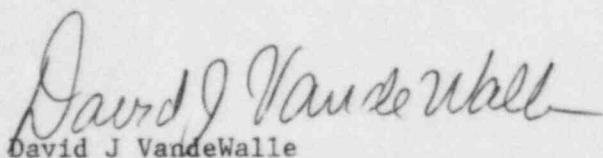
The appropriate equipment to maintain a ten percent screening capability for alpha activity is not currently available. The detection equipment needed to upgrade the alpha survey program has been requisitioned.

Corrective Action to be Taken to Avoid Further Noncompliance

Health Physics procedures will be revised to provide an alpha survey program with appropriate administrative controls. The program will comply with 10CFR20 criteria and provide methods to accurately determine survey requirements.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by May 15, 1985.



David J VandeWalle
Director, Nuclear Licensing

CC: Director, Office of Nuclear Reactor Regulation
NRC Resident Inspector - Palisades