

August 12, 1997

Southern Nuclear Operating Company, Inc.
ATTN: Mr. H. L. Sumner, Jr.
Vice President, Hatch Plant
Nuclear Operations
P. O. Box 1295
Birmingham, AL 35201-1295

SUBJECT: MEETING SUMMARY - RADIOLOGICAL CONTROLS - HATCH NUCLEAR PLANT
DOCKET NOS. 50-321 AND 50-366

Gentlemen:

This refers to the meeting conducted at your request at the NRC Region II Office on August 11, 1997 at 10:00 am. The meeting's purpose was to discuss radiological controls at the Hatch Nuclear Plant.

It is our opinion that this meeting was beneficial in that it provided us with a better understanding of accomplishments and improvement initiatives at the Hatch station.

A list of attendees and a copy of presentation handouts are enclosed.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10 Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this meeting, please contact Mr. Pierce Skinner at (404) 562-4520.

Sincerely,

(Original signed by Pierce H. Skinner)

Pierce H. Skinner, Chief
Reactor Projects Branch 2
Division of Reactor Projects

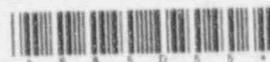
Docket Nos. 50-321, 50-366
License Nos. DPR-57, NPF-5

Enclosures:

1. List of Attendees
2. SNC Slides: Hatch Radiological Controls
3. NRC Region II Observations

cc w/encls: (See Page 2)

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DATE	08 / / 97	08 / / 97	08 / / 97	08 / / 97	08 / / 97	08 / / 97
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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cc w/encls: Continued
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DATE	08 / 11 / 97	08 / 12 / 97	08 / 12 / 97	08 / / 97	08 / / 97	08 / / 97
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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LIST OF ATTENDEES

NRC

K. Barr, DRS, Plant Support Branch Chief
M. Ernstes, DRP
B. Holbrook, Senior Resident Inspector, Plant Hatch
J. Jaudon, Director DRS
G. Kuzo, DRS
L. Plisco, Deputy Director DRP
L. Reyes, Regional Administrator
P. Skinner, DRP, Branch 2 Chief

HATCH NUCLEAR PLANT

P. Wells, Plant Manager
S. Tipps, Manager, Nuclear Safety and Compliance

Edwin I Hatch Nuclear Plant Units 1 & 2



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NRC Management Meeting
Radiological Controls
August 11, 1997

AGENDA

◆ PURPOSE

◆ OVERVIEW

◆ PAST PROBLEMS EFFECTIVELY SOLVED

◆ RECENT PROBLEMS & CORRECTIVE ACTIONS

◆ SUMMARY

PURPOSE

- ◆ DISCUSS CURRENT CHALLENGES IN THE AREA OF RADIOLOGICAL CONTROLS AT HATCH
 - ◆ UNDERSTAND NRC'S PERCEPTION OF HATCH'S CHALLENGES & PERFORMANCE IN THIS AREA
 - ◆ OUTLINE PLANNED CORRECTIVE ACTIONS
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OVERVIEW

- ◆ Plant Management Is Not Satisfied With the Current Level of Performance.
 - ◆ Recent Problems:
 1. Inconsistent Routine Radiological Work Practices
 2. Avoidable Personnel Contaminations
 - ◆ Plant Has Undertaken Comprehensive Corrective Actions
 - ◆ Plant Has Good Record in Solving Problems
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Past Problems Effectively Solved

- ◆ Control of High Radiation Areas Using Locked Doors
 - ◆ Control of Contractors - Poor Radiological Practices
 - ◆ Control of Contaminated Material Outside the RCA
 - ◆ Concerns Regarding Adequacy/Documentation of Surveys
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RECENT PROBLEMS:

Inconsistent Routine Radiological Work Practices:

- ◇ Reaching across contaminated RCA boundary
- ◇ Unsecured hoses/lines crossing contaminated RCA boundary
- ◇ Protective clothing improperly stored

Corrective Actions Planned/In Progress:

- ◇ Communicate management expectations
 - ◇ Use of observation checklist by line supervision
 - ◇ Routine plant “walk-down” by HP management/supervision
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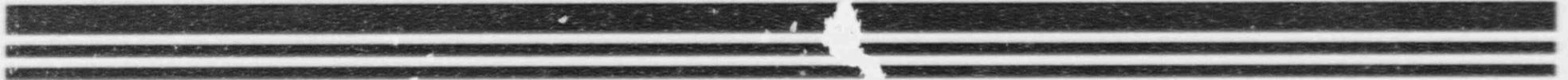
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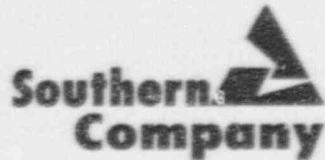
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Contaminations Resulting From Less Than Adequate Radiation Work Practices:

Causes (Identified by Problem Solving Team):

- ◇ Dilution of accountability between the Performance Team and the “core” HP group.
- ◇ Performance Team members did not always report to HP prior to beginning work in an RCA.
- ◇ Personnel were not always being held accountable for avoidable contaminations.
- ◇ Three part communication was not always used between Performance Team members and the “core” HP group.





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Contaminations Resulting From Less Than Adequate Radiation Work Practices (Continued):

Causes (Continued):

- ◇ Performance Team members did not always determine the radiological conditions associated with their work.
 - ◇ Performance Team supervision did not consistently involve the team HP technician in work pre-planning.
 - ◇ Performance Team supervision did not consistently prioritize multiple jobs requiring HP coverage.
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**Contaminations Resulting From Less Than Adequate Radiation
Work Practices (Continued):**

Corrective Actions Planned/In Progress:

- ◇ Communicate management's expectations
 - ◇ Increase personal accountability (management to workers) for avoidable contaminations.
 - ◇ Reassign Performance Team HP technicians to the "core" HP group and matrix them out as necessary to accomplish the needed work.
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Contaminations Resulting From Less Than Adequate Radiation Work Practices (Continued):

Corrective Actions Planned/In Progress (Continued):

- ◇ Require workers using any RWP other than the general tour RWP to report to the appropriate HP location prior to beginning work in the RCA.
 - ◇ Require a multi-discipline investigation of personnel contaminations of $> 10,000 \text{ dpm}/100\text{cm}^2$.
 - ◇ Incorporate review of personnel contaminations into routine plant meetings.
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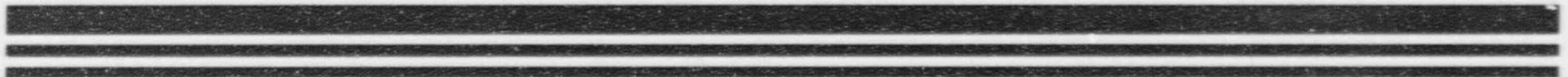


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Contaminations Resulting From Less Than Adequate Radiation Work Practices (Continued):

Corrective Actions Planned/In Progress (Continued):

- ◇ Provide added emphasis on contamination control for Performance Team utilitymen and their team point of contact during training.



SUMMARY:

- ◆ Plant Hatch Radiological Program Meets Regulatory Requirements.
 - ◆ Hatch Management Is Not Satisfied With the Current Level of Performance.
 - ◆ Plant Hatch and NRC Management Agree That the Recent Problems Are:
 1. Inconsistent Routine Radiological Work Practices
 2. Avoidable Personnel Contaminations
 - ◆ Comprehensive Corrective Actions Are Being Implemented To Resolve These Problems.
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NRC RII OBSERVATIONS

Hatch Nuclear Plant (HNP) has demonstrated improvements in selected Radiation Control program areas. Examples include:

- Resolution of locked high rad doors issues.
- Plant exposure data (3 year average person-rem data) continue to demonstrate decrease.
- Radwaste generation reduction program initiative implemented.

In addition, the licensee has upgraded contamination control equipment, e.g. tool monitors and friskers. The Plant Issues Matrix (PIM) identified IRs which document intermittent successes in housekeeping and contamination controls. However, the majority of entries have been negative. Contamination events and release of materials outside of RCA have been a continuing problem at HNP since 1995. HNP has not been aggressive in controlling contamination events and release of contaminated materials due to:

- lack of detailed followup of events resulting in contamination levels less than 10,000 dpm/100 cm²
- high threshold for issuing PCRs, i.e., 10,000 per probe area versus 1000/probe area for majority of industry licensees
- lack of technician sensitivity to contamination resulting from noble gas contamination
- poor communication between HP and maintenance teams regarding job scope and activities
- use of broad Radiation Work Permit requirements
- actions have not been aggressive until NRC emphasis placed on issue