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NT-88-0123

R. P. McDonald
Senior Vice President



April 6, 1988

Docket Nos. 50-348
50-364

License Nos. NPF-2
NPF-8

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

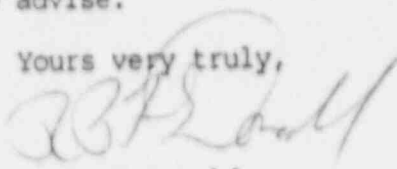
Re: Inspection Report 88-02

Gentlemen:

During an Enforcement Conference on February 17, 1988 at the Region II office a number of exceptions in Inspection Report 88-02 taken by Alabama Power Company were discussed. Mr. D. M. Collins, Branch Chief of Radiation Protection, Region II, requested that Alabama Power Company provide a list of exceptions in the subject inspection. Enclosed is a list of the noted exceptions along with a position taken by Alabama Power Company. Note that this submittal is not in response to the Notice of Violation of March 10, 1988.

Should there be any questions or comment, please advise.

Yours very truly,


R. P. McDonald

RPM/MAY:emb

Enclosure

cc: Mr. L. B. Long
Dr. J. N. Grace
Mr. E. A. Reeves
Mr. W. H. Bradford

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Exceptions Identified in Inspection Report 88-02

p.112 "However, the Plant Manager took exception to all findings."

APCO Position: Plant management agrees with Item (2).

p.211 "The areas on the list were not identified as requiring special radiation work permits (RWPs) or radiological controls and precautions."

APCO Position: A special RWP is not required to enter a high radiation area.

p.212 "A health physics (HP) technician was assigned to support the contract decontamination foreman and his crew during the scheduled decontamination activities."

APCO Position: The HP technician who was assigned to support decon activities was not assigned to provide continuous coverage.

p.214 "The technician left the room unlocked and unattended."

APCO Position: Room 450 was not left unattended in that either the contract foreman or the HP technician was in the area whenever the door to the room was unlocked. The HP technician did lock the door behind him upon completion of his survey.

p.315 (1) "that the work was performed on a routine RWP in lieu of a required special radiation work permit;"

APCO Position: A special RWP was not required for entry into the high radiation area of Room 450.

p.315 (2) "a pre-job briefing was not held and as a result workers were not aware that the work would be performed in an exclusion area;"

APCO Position: A pre-job briefing was not required for entry into the high radiation area of Room 450. There was no intent for workers to enter Room 449.

p.315 (3) "they were not aware that the flashing red light and triple barricade of yellow magenta rope designated an area requiring special precautions;"

APCO Position: The laborer who entered the exclusion area admitted following the incident that he knew not to enter an exclusion area although he did not know the definition of an exclusion area.

p.315 (4) "the contract waste and decon foreman was not sufficiently trained in radiological control precautions and limitations for work in high radiation and exclusion areas to have control of keys to these areas;"

APCO Position: The keys in question were issued to the contract foreman under an approved RWP for entry into the high radiation area of Room 450. Access to the exclusion area was not being controlled by key.

- p.4¶1 (5) "the workers and foreman were not aware of the contamination or radiation levels of the areas in which they were working;"

APCO Position: Postings were accurate and prominently displayed on the 3-rope barricade. The worker stated that he read the postings and noted the exclusion area.

- p.4¶2 (1) "he did not receive a briefing upon assignment to support the decontamination activities;"

APCO Position: There is no requirement to brief radiation workers (especially HP technicians) on high radiation area entries. There was no intent for the HP Technician to enter an exclusion area. The HP technician did not enter an exclusion area for which a briefing would have been required.

- p.4¶3 "the supervisor was not aware that any of the ten rooms listed to be decontaminated contained high radiation or exclusion areas,"

APCO Position: Although the W&D Foreman did not know which specific rooms on the work list contained high radiation areas, he was well aware that many rooms in the Auxiliary Building contain high radiation areas. Briefings are not required for high radiation area entries.

- p.4¶4 (2) "the licensee failed to properly train personnel in the limitations and precautions of an exclusion area;"

APCO Position: All radiation workers had been trained on the significance of red flashing lights.

- p.4¶4 (3) "personnel were allowed to enter an exclusion area without the performance of an adequate survey to evaluate the extent of the hazards that were present;"

APCO Position: The HP technician did not allow the exclusion area entry.

- p.4¶4 (4) "the licensee failed to provide positive access control to a high radiation area to prevent unauthorized entry."

APCO Position: The contractor foreman was issued a RWP for high radiation area entry. There is no requirement to lock doors to a high radiation area. Positive access control for the exclusion area was provided by a 3-rope barrier, posting, and red flashing light.