



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

*Broder*

JAN 23 1981

EGM-81-05

MEMORANDUM FOR: James G. Keppler, Director  
Region III

FROM: Dudley Thompson, Director  
Enforcement and Investigations, IE

SUBJECT: CONTESTED NONCOMPLIANCE - PALISADES HEALTH PHYSICS APPRAISAL

Reference: Keppler memo dtd January 19, 1981

The proposed violation regarding the timeliness of completing a survey (evaluation) for purposes of calculating the total amount of radioactivity released from the Palisades stack appears to be inappropriate in this particular case; i.e., the inability of personnel to complete the evaluation in less than 14 hours; for the following reasons:

1. The release was terminated within a reasonably short period of time by the shift supervisor, thereby alleviating the problem; all that remained was the evaluation of the magnitude of the release, ex post facto.
2. Had NRC personnel not been present at the site, any subsequent reports, had they been required, would most likely not have addressed the time needed to perform the evaluation, only the results and time of occurrence.
3. The licensee apparently concluded correctly from previous similar increases in releases of the same magnitude that off-site emergency procedures would not need to be implemented.
4. We agree that the relatively simple conversion factors needed for such evaluations should be part of their emergency procedures (if they are not already) and further, that plant personnel should know those procedures as well as the kinds of equipment being used (linear and logarithmic recorders). We also note that the licensee has apparently taken more than just acceptable corrective measures.

As stated above, we believe that the timeliness of the evaluation is not a valid reason for citing the licensee in this case. That is not to say that there is not noncompliance involved, from the standpoint of insufficient training and/or lack of implementation of appropriate emergency procedures to evaluate releases.

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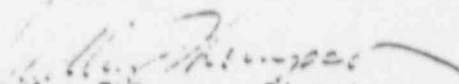
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There are cases where "surveys" as defined in Part 20 must be immediate for making evaluations to preclude an emergency situation; e.g., performing a physical survey on radiographic equipment upon source retraction, knowing (evaluating) when to terminate a stack release, etc.

In summary, we believe that the noncompliance should be couched in terms of availability of emergency procedures and training in the use of such procedures if they exist.

  
Dudley Thompson, Director  
Enforcement and Investigations  
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