

4. Corrective steps planned to avoid further violations:

All HP Technicians, Supervision, and Staff will attend formal case studies to further analyze T.S. requirements and to evaluate the incident. The case study is designed to point out what happened, when it happened, potential causes, short term preventative actions taken, most probable root cause, and to provide an opportunity for group analysis. Each attendee will be able to provide input on how further violations can be avoided. Management will evaluate these recommendations and implement appropriate changes.

5. The date when full compliance will be achieved:

Duke is in full compliance now. The case study will be completed by June 1, 1988.

ATTACHMENT 2
DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
INSPECTION REPORT NUMBER 50-369, 370/88-06

CORRECTION AND CLARIFICATION

The following information is offered to clarify and/or correct information contained in the referenced report.

1. Page 2, Section 4 of the report stated that, "It was also stated that corporate ALARA staff support should increase in the future due to the recent change in corporate supervisory personnel responsible for that group."

Clarification

The Duke Power Company corporate ALARA staff will be providing increased support to McGuire as requested by station management due to concerns over high station doses; however, the corporate ALARA supervisor has not changed.

2. Page 3, Section 6 of the report stated that, "Plant procedures require an investigation of all pocket ion chamber (PIC)/TLD correlations that are different by $\pm 10\%$."

Correction

Duke does not use fixed percentages for comparing monthly TLD and pocket dosimeter (PD) totals. Sliding percentages are used with a positive bias to accommodate rounding off errors. Example: For TLDs equaling 100 mrem, PD totals between 55 and 170 mrem are permitted. For TLDs equaling 300 mrem, PD totals from 240 to 375 mrem are allowed. For TLDs greater than 500 mrem, the permitted range is $0.9 \times \text{TLD}$ to $1.25 \times \text{TLD}$. No TLD/PD comparisons are made for TLDs less than 60 mrem and PD totals less than 85 mrem.

3. Page 5, Section 7 stated that, "The NaI chair counter currently in use will remain in service after the purchase for backup and positive count verification."

Correction

Duke has determined that the NaI chair counter will remain in service depending upon space available following installation of the standup whole-body quick counter. If space is not available, Duke will remove the NaI chair counter from service.

4. Page 6, Section 9 of the report stated that, "An individual from the corporate ALARA group will be added for the May 1988 outage.

Correction

In response to station requests, two individuals have been provided from the Duke corporate Health Physics staff to assist with ALARA planning for the May 1988 outage. These individuals will work with station maintenance during job planning and execution to resolve exposure problems, perform dose tracking functions, and provide interface with station Health Physics as necessary.

5. Page 7, Section 9 of the report stated that the inspector discussed "the negative effect that the setting of apparently unattainable goals may have on workers drive and desire to achieve those goals".

Clarification

Collective dose goals for Duke Power Company are based on national averages for pressurized water reactors. The collective dose goals for each Duke nuclear station is adjusted based on the anticipated workload using the best available industry data. The dose goals for McGuire of 1,043 person-rem is an aggressive goal that will be challenging for the station to achieve. However, tremendous progress has been made in job planning, available resources, and worker awareness of exposure. As a result, there is increasing optimism both on the corporate and station management level that the station dose goal can be achieved.