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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

August 15, 1988

PRIORITY ROUTING

| First      | Second |
|------------|--------|
| ✓ K.A. HAS | RC     |
| ✓ DWA HAS  | ETC    |
| ✓ DRP HAS  | SGA    |
| ✓ GRS      | HL     |
| ✓ DRSS     | MI     |
| ✓ DWA      | OT     |
|            | WAD    |

REG-1  
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Docket No. 50-451

Mr. A. B. Davis  
Regional Administrator  
Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Response to Allegation Concerning  
Radiation Protection Practices

Dear Mr. Davis:

Nuclear Regulatory Commission (NRC), Region III letter dated July 1, 1988, forwarded an allegation, #RIII-88-A-0050 concerning Radiation Protection Practices at Clinton Power Station (CPS), to Illinois Power Company (IP) for investigation. The IP Quality Assurance Department has completed this investigation, and the results are summarized in Attachment A to this letter.

Please contact me if you have any questions regarding this information.

Sincerely yours,

D. L. Holtzsch  
Acting Manager - Licensing and  
Safety

KAB/ckc

Attachment

cc: NRC Clinton Licensing Project Manager  
NRC Resident Inspector  
Illinois Department of Nuclear Safety

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PDR ADOCK 05000461  
P PDC

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ATTACHMENT A  
Illinois Power Company  
Clinton Power Station

1. The allegation stated that on occasion, health physics technicians in the plant have improperly deleted Radiation Worker Permit (RWP) protective clothing requirements without modifying the RWP. A specific example was provided.

Response:

This allegation has been substantiated. The specific example stated in the allegation could not be identified; however, a similar condition was identified on April 21, 1988.

The investigation concluded that, as required, RP technicians had been reviewing radiological conditions for changes, but had not always been completing the administrative function of modifying the RWPs accordingly. To correct this problem, on June 19, 1988, a Radiation Protection Operations Night Order was issued to RP shift supervisors and RP technicians reinforcing the administrative functions required to be completed when changing radiological protective requirements.

While the allegation has been substantiated, it is important to note that radiological control procedures require that each individual obey posted, oral, and written radiological control instructions and procedures, including instructions on RWPs. Additionally, each individual shall not deviate from the requirements stated on the RWPs unless directed to do so by RP personnel.

2. The allegation stated that the physical flowpath of personnel through the three frisker monitors located at the exit of the Radiologically Controlled Area (RCA) was conducive to personnel cross-contamination because the three monitors were physically aligned such that individuals leaving the monitors walk across the path of individuals waiting to be monitored.

Response:

This allegation has been substantiated. Investigation revealed that because of the physical location of the radiation monitors at the RCA exits, the potential exists for cross-contamination of personnel.

The Assistant Manager - Plant Radiation Protection is evaluating methods for relocating the radiation monitors at the RCA exits to prevent the potential for cross-contamination. Recommendations for improvement will be provided to the Manager - Clinton Power Station by August 31, 1988.

ATTACHMENT A  
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IP's review of this condition determined that it has no significant impact on the Radiological Control Program. Radiation monitors located at the exits of the Protected Area will identify personnel who have passed through the RCA exit monitors and subsequently become contaminated by crossing the path of a contaminated person. Additionally, RP conducts routine radiological surveys (smears) of the power block entrance, the lunchroom, the operations gate house exits, and the craft security portal exits when in use. These routine surveys add assurance that contaminated personnel are not exiting the RCA.

3. The allegation stated that hand held friskers were not located near step-off-pads from radiologically contaminated areas. The example given was that no frisker was located on the 824-foot level of containment; the nearest frisker station was located on the 737-foot level of containment.

Response:

This allegation has been substantiated. Investigation revealed that a frisker was not located at the 828' elevation personnel airlock; a frisker has since been placed at this location.

The investigation further revealed that prior to receiving this allegation, a concern had been expressed about friskers not adequately identified or located for egress from contaminated controlled areas. An evaluation of this concern and recommendations to the Manager - Clinton Power Station for improvements will be completed by August 31, 1988.

IP's review of this condition determined that it has no significant impact on the Radiological Control Program. Personnel are responsible for notifying RP when contamination is detected or suspected. It is routine practice for RP to survey the path of the contaminated individual if the individual had to travel to a frisker. If an individual alarms a radiation monitor while exiting the RCA, RP is notified and conducts radiological surveys of the path of the individual.

4. The allegation stated that several personnel contaminations had occurred recently involving localized skin contamination. Rather than decontaminating the localized skin area, the individuals were decontaminated by showering, which could result in the spread of contamination over the body.

Response:

This allegation could not be substantiated. The investigation concluded that IP has adequate procedures in place to decontaminate personnel. The review of Personnel Decontamination Records for May, June, and July did not identify any instances of improper decontamination.

ATTACHMENT A  
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Clinton Power Station

Summary

A collective analysis of the substantiated allegations has determined that these conditions do not significantly impact the Radiological Control Program. As a result of the allegations however, evaluations are being performed to determine possible methods for improvement in the noted areas. The Radiological Control Program, as implemented to date, has been demonstrated to fulfill its function in providing a high degree of protection to the employees at CPS.

Supporting documentation providing the details of this investigation has been compiled and is available at CPS for NRC review.