D. C. COOK PLANT

RADIATION PROTECTION PROGRAM PRESENTATION

FOR PRESENTATION AT NRC REGION III 10/3/85

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EXISTING PROGRAMS

The current status of the issues is as follows:

 Surveys/surveillance program needs improvement (teletectors, HRA not identified/posted, RA dome, some contaminated areas).

The established written survey program frequency appears to be adequate. Several noted areas were on a daily survey schedule.

TSO-032 was initiated on November 20, 1984, which requires RP Supervisors and Engineers to tour plant controlled areas for the purpose of identifying RP violations and providing corrective actions. This practice has had some positive effect as noted by the required reports, but has not been completely effective in stopping problems.

Additional radiation areas noted which were improperly posted were created as a result of operating systems. Currently, we do not have a formalized plant systems training program with all the associated benefits of making the technician sensitive to the potentials of changing radiation levels.

Informal training currently takes place through supervisors and journeyman level pre-job reviews with informal practical training and job demonstrations provided by supervisors and journeymen as junior technicians demonstrate their skills for advancement.

The Donald C. Cook Nuclear Plant Training organization, with the support of the Radiation Protection supervisory staff, are in the process of building an INPO accredited Radiation Protection Training Program. Currently, Radiation Protection Section journeymen and supervisors are analyzing, through Job and Task Analysis, the skills and knowledges that a skilled journeyman Radiation Protection Technician must possess to be competent. The associated knowledges are being identified in lesson plans and are being prepared for formal classioom presentations, and identified skills requirements will be proven via a qualification card program. In addition, it is anticipated that this formal training will include systems training to the extent that the technician will be knowledgeable relative to RP considerations on the operation of identified systems. The formalized program implementation of the RP Training Program is scheduled to begin on June 1, 1986.

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 Increased oversight of contract HP techs and other contractors needed (historically contractors run assigned jobs with little direct involvement/knowledge by plant HP personnel - one HP tech was assigned to assist contract HP tech at last outage.

The current practice is to provide an acting I&M RP Superivosr in the Contractor's Access Control area. This Supervisor is provided to oversee and direct with authority, the work activities of the contract technicians. Since this supervisor is not burdened with a large amount of administrative duties, he is capable of supporting a larger work force. In addition, this supervisor has been able to provide some oversight and guidance of the Maintenance and Contractor work force on Radiation Protection/ALARA issues. The Technical Physical Sciences Department has had full time outage coordination which provided observation and oversight of the RP contractors, and guidance on Radiation Protection issues.

TSO-032, as described above, requires a review of areas, etc., which have been surveyed and posted by the contract and house technicians and is used to provide evidence of their work. The contract technicians who assist the house side of the plant receive their daily assignments and are under the direct supervision of house RP supervision.

In May of this year, a Management/Housekeeping weekly tour of assigned areas was begun. This program requires management observation of on-going work to insure personnel are following RWP requirements. It also requires observation of housekeeping and material storage areas, which indicates worker procedure compliance.

A technical review of contracted services was completed which indicated that controls were in place and quality services were being provided.

3. Storage of radioactive material needs improvement (no controlled dedicated storage area - or at least not with sufficient space; numerous poorly controlled/surveyed storage areas throughout aux. building with little access control).

During this current Unit 1 refueling outage, a conscientious effort has been made to keep material storage areas to a minimum. This effort was effective when compared to previous refueling outages. On August 14, 1985, a containment clean up effort was begun for ILRT and was again expanded on September 3, 1985 in anticipation of a change to Mode 4 operation. This effort created material storage problems and was compounded when the rad. waste sorter was inoperable. Our efforts to reduce rad. waste volumes Attachment 1 Page 3 of 4

dictated that material be saved for processing. In addition, 10 CFR 61 regulations for filter shipping and burial requirements has required us to store filter barrels longer than normal practice, which has burdened the normal storage areas.

4. Procedure adherence appears needs improvement including aggressive enforcement with management support (apparent from number of "condition reports" showing personnel violating RP's, etc.).

Condition reports are being forwarded to the department head of the individuals who violated the procedure for investigation and resolution. Tracking and trending these reports is in progress. Root causes are identified and corrective actions are taken.

In December of 1984, the Cook Plant's RP General Employee training program received INPO certification after significant adjustments to this program were made. For example, all new contractor employees were given hands-on training, and required to do practical demonstrations relative to the following:

- A. Donning anti-contamination clothing,
- B. Use of step-off pads,
- C. Removing anti-contamination clothing,
- D. Proper frisking techniques, and
- E. Use of data entry terminal units.
- Not responsive to inspector/NRC concerns regarding TMI items compliance.

During investigation of the open items identified in late 1984, additional issues were presented in March and July of 1985. A lack of understanding of the magnitude of the items existed during the initial evaluations. After discussions with Region III personnel, it was agreed to prepare a NUREG 0737 compliance document.

6. Large number of minor skin contamination incidents.

All skin contaminations are being reported for the purpose of tracking and trending to determine root causes and institute corrective action.

 Weak corporate/plant communications (generally poor job of ensuring own conformance to TMI actions after prompted by NRC RIII). The Corporate/Plant interface is strong. Discussions take place as often as daily on RP issues at all levels of both organizations. Although there are discrete responsibilities, problems identified are referred to the appropriate Section. Mutual cooperation is provided in order to obtain an integrated practical solution for both organizations. A Joint Corporate/Plant team has been established to review all radiological procedures, practices and instrumentation. Corporate/Plant inferface on Radiation Protection issues is currently taking place on procedures, dose assessments, positive whole body counts, beta protection practices, bioassays, and external dosimetry evaluations.

 RP technicians not paying attention to the details of work effort, inadequate evaluation and subsequent Iodine release in containment (contractor related) general feeling based on reviewing "condition reports".

On July 23, 1985, the Technical Superintendent - Physical Sciences established a policy of first line supervisors priority function being to oversee and direct with authority, the on-the-job behavior of the work force.

9. HVAC System Problems

Significant progress has been made toward improving the overall condition of Technical Specification related ventilation systems. Particular attention has been given to the charcoal filters. We believe the steps taken will ensure satisfactory performance of the systems with only routine surveillance needed. As resources allow, we will be checking other non-Tech. Spec. systems for similar deficiences. Attachment II Page 1 of 4

GOALS & OBJECTIVES

- Surveys/surveillance program needs improvement (teletectors, HRA not identified/posted, RA dome, some contaminated area).
- The RP Section accredited training program, including system and practical training will begin June 1986.
- 1b. All the Radiation Protection Supervisors will be required to oversee technician on-the-job work efforts 40% or more of the Supervisor's time, beginning November 1, 1985. This will continue until March 1986, when based on a review of the effect of this effort, the required time of observation may be adjusted.
- 1c. A method to control the transport of radioactive material within the controlled areas will be established in order to prevent the unauthorized additions and alterations of radioactive material to a storage area. This method will be established and functioning January 1986.
- 2. Increased oversight of contract HP techs and other contractors needed (historically contractors run assigned jobs with little direct involvement/knowledge by plant HP personnel - one HP tech was assigned to assist contract HP tech at last outage).
- 2a. As described in 1b, all the Radiation Protection Supervisors will be required to oversee technician on-the-job work efforts 40% or more of the Supervisor's time beginning November 1, 1985. This will continue until March 1986 when, based on a review of the effect of this effort, the required time of observation may be adjusted.
- 2b. A program will be established that ensures supervisors in all plant departments and construction perform routine observation of personnel performing radiological work. This program will be in place and operational by January 1986.
- 2c. Contractor evaluating will be performed biennially.
- 3. Storage of radioactive materials needs improvement (no controlled dedicated storage area - or at least not with sufficient space; numerous poorly controlled/surveyed storage areas throughout aux. building with little access control).

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- 3a. Areas utilized for decontamination of material and material release areas will be identified and kept to a minimum. The temporary areas utilized for equipment storage will be reduced >50% by July 1, 1986.
- 3b. A program for materials transport control will be established by January 1986.
- Procedure adherence appears needs improvement including aggressive enforcement with management support (apparent from number of "condition reports" showing personnel violating RPs, etc.).
- 4a. The programs noted in 1b. and 2b. will help insure procedure adherence. In order to increase management awareness of any deficiencies, reports generated will be provided to the appropriate department head for information or additional corrective action. This process will begin by November 1, 1985. A monthly summary of the cases and corrective actions will be provided to management, beginning December 1986 for the November reports. Reporting will continue until March 1986. The reports will be reviewed for the effectiveness of increased Supervisor overview of the on-the-job work effort.
- 4b. All nuclear workers who have not had the accredited practical training and/or demonstrated radiological work practices, will be trained and demonstrate capability by July 1986.
- Not responsive to inspector/NRC concerns regarding TMI item compliance.
- 5a. The Phase I compliance analysis report was completed September 30, 1985. This report contains a determination of whether or not documentation exists for compliance with the RMS and PASS NUREG 0737 criteria.
- 5b. The studies and actions found necessary to document the RMS/PASS system designs during Phase I will be initiated. All studies will be completed by July 1, 1986. Any resutling equipment modification schedules will be included in the actions.

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- 6. Large number of minor skin contamination incidents.
- 6a. Total skin contaminations identified >100 cpm by a frisker over a quarterly time period will be reduced >50% from the third quarter of 1985 by the third quarter of 1986.
- Weak Corporate/Plant communications (generally poor job of ensuring own conformance to TMI actions even after prompted by NRC RIII).
- 7a. The Joint Corporate/Plant team will continue to meet and review the procedures, practices and instruments on at least a quarterly basis. In addition, corporate Radiation Support will review and assess operational performance in Radiation Protection and report to the Joint Group and Managers semi-annually.
- 7b. Reviews of whole body counting, the Dosimetry program, bioassays, and the Beta Protection program, will be conducted quarterly.
- 7c. Technical evaluations of contractors supplying Radiation Protection services will continue on at least a biennial basis.
- 8. RP Technicians not paying attention to the details of the work effort (SG purge inadequate evaluation and subsequent I release in containment (contractor related) general feeling based on reviewing "condition reports).
- 8a. As described in Goal 1b, an essential requirement to insure the required attention is applied to the details of the work effort, is the oversight and guidance of a Supervisor.
- 8b. Incident response training will begin June 1986.
- 9. HVAC System Problems
- 9a. The condition of the Tech. Spec. related charcoal filters was found to be deficient. A complete review of the Tech. Spec. related ventilation systems, including fire protection and drainage, will be conducted and corrective actions identified by November 1, 1985. A schedule for implementation of corrective actions will be included in the review report.

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In addition, several goals have been established to strengthen the overall Radiation Protection Program which are not specific to the items identified:

- A visit to a Region III SALP I rated plant in the Radiation Protection area will be made in order to observe and compare radiation protection practices and working conditions including space limitations, etc. This will be completed and lessons learned will be reported by July 1986.
- An INPO evaluation of a plant will be attended to observe and compare radiation protection practices. This will be completed by July 1986.
- 3. A summary report of the results of this upgrade program will be prepared by the end of 1986.