

NOTICE OF VIOLATION

Cleveland Electric Illuminating
Company

Docket No. 50-440

As a result of the inspection conducted from May 2 through June 2, 1989, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1988), the following violations were identified:

1. 10 CFR 20.201(b) requires each licensee to make such surveys as (1) may be necessary for the licensee to comply with the regulations in Part 20, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.
 - a. Contrary to the above, on March 24, 1989, the licensee did not make a survey of the work area before two workers entered the area. This survey was necessary for the licensee to show that dose rates in the area would not result in doses to the workers in excess of the quarterly dose limits in 10 CFR 20.101.
 - b. Contrary to the above, on March 24 and 25, 1989, the licensee made two surveys of the same area from an adjacent walkway without entering the work area. As a result the radiation levels in the area were not adequately determined.

This is a Severity Level IV violation (Supplement IV).

2. 10 CFR 20.202(a)(3) requires that each licensee supply appropriate personnel monitoring equipment to each individual who enters a high radiation area.

Contrary to the above, on March 24, 1989, the licensee did not supply appropriate monitoring equipment to two workers who entered a high radiation area. Specifically, dosimetry was not supplied for the head and upper back of two workers who entered an area and worked with their head and upper back closest to the source of the radiation in the area; dosimetry was worn on the chest.

This is a Severity Level IV violation (Supplement IV).

3. Technical Specification 6.11.1 requires that procedures for personnel radiation protection be approved, maintained, and adhered to for all operations involving personnel radiation exposure.
 - a. Perry Procedure, PAP-0122, Selection and Use of Temporary Shielding, requires the work supervisor to ensure that temporary shielding is

installed in accordance with the procedure. Section 6.2 of the procedure specifies that the individual requesting temporary shielding complete Form PNPP No. 6623 and that the ALARA Coordinator estimate the person-rem exposure for the job if shielding was not installed.

Contrary to the above, on March 24-25, 1989, a work supervisor did not ensure that temporary shielding was installed in accordance with the procedure. Specifically, temporary shielding was installed on a low-pressure coolant injection system pipe during a job, and Form PNPP No. 6623 was not completed and the ALARA Coordinator did not estimate the person-rem exposure for the job if shielding was not installed.

- b. Perry Procedure, PAP-0124, Radiological Occurrence Reporting, defines a radiological occurrence as an event which results in or could result in a violation of the intent of Perry radiological procedures, practices, or policies; or personnel radiation exposures in excess of administrative guides and 10 CFR 20 limits. Section 3.4 of the procedure states that individuals are responsible for reporting radiological occurrences in a timely manner. Section 6.3.1 states that radiological occurrences are reported using PNPP No. 6641.

Contrary to the above, on March 24-25, 1989, a potential overexposure occurred which resulted in or could have resulted in a violation of Perry radiological procedures, practices, or policies, and the event was not reported as a radiological occurrence.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

JUN 28 1989

Dated _____

Charles E. Norelius

Charles E. Norelius, Director
Division of Radiation Safety
and Safeguards