

October 17, 1978

Mr. Hilbert W. Crocker, Acting Chief
Fuel Facility and Materials Safety Branch
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

RE: Docket No. 50-220
Inspection Report 78-12

Dear Mr. Crocker:

This refers to the inspection conducted by Mr. K. Plumlee of your office on August 28-31, 1978 at the Nine Mile Point Nuclear Station Unit #1. The following responses are submitted to the alleged items of non-compliance as detailed in Appendix A of your letter dated September 27, 1978:

- A. Contrary to the requirements of Technical Specifications Section 6.3.1, four technicians were assigned responsible positions in the Radiochemistry and Radiation Protection organization involving the evaluation of radiological hazards and the issuance of Radiation Work Permits who did not have the required minimum of two years of working experience in their specialty. These assignments became effective commencing October, 1977, for two individuals and commencing April 1978 for the other two individuals.

RESPONSE

In order to relieve the individuals of the responsibility referred to in ANSI N18.1-1971, all Radiation Work Permits drafted by individuals with less than two years of experience have been reviewed and countersigned by a responsible person since the end of August, 1978. This practice will continue for all individuals with less than two years experience in their specialty. Therefore, full compliance has been achieved.

The four individuals cited were assigned to write RWP's for jobs and areas in which they were qualified to make the proper decisions based on foremen and supervision observation of competence demonstrated during their on-the-job training. Management responsibility prior to August 1978 was exercised through the foremen in assigning jobs to the technicians which were within their capability.

- B. 1. Contrary to Section 2.4.5 of S-RTP-50, on August 31, 1978, two dosimeters, Nos. 701088 and 250968, were held for use by individuals and had not been calibrated for twelve months or more.

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RESPONSE TO B.1

Since August 31, 1978, we have performed three separate samplings of personnel self-reader dosimeters. These samplings (10-25 each) have indicated >95% are within the required six month calibration frequency. It is considered that full compliance has been achieved, since the testing interval is a recommendation (should be) rather than a requirement (shall be), both in procedure S-RTP-50 and in Regulatory Guide 8.4.

We intend to develop a more effective method of dosimeter control which will facilitate the exchange of calibrated for non-calibrated dosimeters at each subsequent calibration.

- B. 2. Contrary to Section III F of the Station Radiation Protection Procedures, no alpha smear counting was performed between January 1, 1978 and August 28, 1978.

RESPONSE

During the period of approximately March-August, 1978, the alpha-counter was inoperative due to electronic problems. In September, 1978, repair was completed. Since then, alpha activities have been determined to be ≤ 10 d/m/100cm² on station contamination disc smears. In the future, when the alpha system is inoperative, alpha determinations of station contamination smears will be accomplished at the J.A. FitzPatrick Radiochemical Lab or by contractor. This task has been assigned to a technician for monthly determination.

During the instrument inoperative period, alpha analyses of samples, other than station contamination surveys, was performed by contractor, or using alternative equipment.

Full compliance has, therefore, been achieved.

- C. Contrary to Technical Specifications Sections 4.6.5 and 3.6.5, the 0.5 gram Pu plutonium-beryllium source was not tested so as to detect the potential presence of 0.005 microcuries of plutonium in the test sample at any time between January 1 and August 30, 1978.

RESPONSE

Technical Specifications 4.6.5.2 does not require that a leakage test be performed on sources "that are stored and not being used". During the period between January 1 and August 30, 1978, the 0.5 g Pu (plutonium-beryllium) source was not in use, therefore, no test was required. (On October 11, 1978, however, the alpha activity was determined and found to be $\leq 1 \times 10^{-5}$ uCi.) Normally, a test is performed even when not required (due to non-use), as it serves as a means of keeping the inventory current. In the future, either the test will be performed in an acceptable fashion, or the fact that no test was required due to non-use will be recorded, along with appropriate inventory data. Therefore, full compliance has been achieved.



- D. Contrary to Technical Specification Section 6.13.1b, at 6 p.m. on August 28, 1978, the gate on the 261 ft. elevation of the turbine building nearest to door No. 56, controlling an area wherein the radiation intensity was greater than 1,000 mrem/hr, was unlocked and unattended.

RESPONSE

In order to prevent re-occurrence of this item, a technician has been assigned the responsibility of checking all accessible High Radiation Area gates (> 1000 mrem/hr) on a regular basis (at least three checks per week). This action has been taken in addition to actions identified in response to Inspection 77-26, which produced the improvement noted in this inspection report.

Very truly yours,

R.R. Schneider
R.R. Schneider
Vice President -
Electric Production

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