

June 8, 1979

Mr. George H. Smith, 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 79-07

Dear Mr. Smith:

This refers to the inspection conducted by Mr. L.H. Thonus of your office on March 13-16, 1979 at the Nine Mile Point Nuclear Station #1. The following is submitted in response to the alleged items of non-compliance detailed in Appendix A of your letter dated May 16, 1979.

1. Procedure RP-2, Radiation Work Permit Procedure, states in Section 5.2, that, "the leadman is responsible for familiarizing personnel with all the instructions on the permit, and insuring that these instructions are strictly followed". Contrary to the above:
  - a) On March 14, 1979, the access gate to the Reactor Water Heat Exchanger Cubical was found open, unattended, and was not under direct surveillance by individuals working under RWP No. 523, which required that the access gate must be locked at all times.
  - b) On March 16, 1979, the Turbine Deck access gate was found open and unattended (personnel had left the area) without closing and locking same as required by RWP No. 625.

RESPONSE

1. a) The appropriate supervisor was informed that there was an area, within the gated area, access to which was possible without surveillance by the individuals working in the heat exchanger area. The RWP requirement to keep the door locked was reviewed, and for subsequent work in the area, an access control individual was kept at the gate at all times when the gate was open. When not under surveillance, the gate was kept closed and locked.

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RESPONSE (continued)

1. a) To avoid further items of non-compliance, the station checks of High Radiation Area Gates (instituted as a corrective action in response to Inspection 78-12) are being performed ten to fourteen times per week during the outage. In addition, compliance with RWP requirements is being verified with each station check performed by Radiation Protection supervisors on shift.
1. b) The RWP requirement to keep the gate locked was reviewed with the appropriate supervisors. During periods when turbine and valve maintenance resulted in accessible High Radiation Areas, an access control individual was kept at the gate to unlock the gate when access was required. Other corrective actions, given in response to Item 1.a, are also applicable to this item to avoid further items of non-compliance.
2. Procedure RP-2, Radiation Work Permit Procedure, requires in Section 4.5, that for each individual signed in on an RWP, the remaining authorized radiation exposure ( $\Delta$  Auth. Exp.) must be entered next to his name prior to commencing work under the RWP.

Contrary to the above, (the listed RWPs identified) instances where individuals had signed in on the RWP and had commenced work without having their remaining  $\Delta$  Auth. Exp. entered.

3. Procedure RP-2, Radiation Work Permit Procedure, requires in Section 5.6 that if a qualitative mask fit test is required, it will be specified in the "Protective Clothing and Other Requirements" section of the RWP by a check in the "Respiratory Mask-Fit Test and Results Required" box. Indication of having passed the test must be indicated by a "✓" in the "Passed Fit Test" column of the RWP when sign in.

Contrary to the above, the (listed RWPs identified) RWPs which contained a check in the "Respiratory Mask-Fit Test and Results Required" box, but did not contain a check in the "Pass Fit Test" column to indicate passage of the test.

The individuals listed had worked under the RWP as indicated by signing in and out on same.

4. Procedure RP-2, Radiation Work Permit Procedure, requires in Section 5.13 that if a job carries over to the next shift, the RWP must be approved by the appropriate Radiation Protection Technician and Leadman. For RWPs not requiring Radiation Protection coverage, a Radiation Protection Supervisor shall indicate approval by signing for the appropriate time period.

Contrary to the above, the (listed RWPs identified) RWPs which carried over to the next shift and were not approved by the appropriate leadman. No Radiation Protection Supervisor's signature was present to indicate that the RWP did not require Radiation Protection coverage.



RESPONSE TO ITEMS 2, 3, and 4

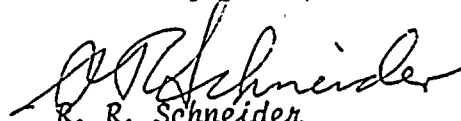
The Radiation Protection supervisor station inspections mentioned in Response 1.a are being used for "on the spot" training of persons who have not adhered to the RWP requirements.

In addition, the radiation protection training provided personnel was reviewed to ensure that the procedure provisions which have been violated are adequately stressed in training. It has been concluded that coverage is adequate, but due to the complexity of the subject matter and procedures, many individuals have difficulty assimilating all the necessary requirements. The solution is to accomplish "on the job" training to supplement classroom training, so that the first few days work for an individual is actually an extension of his training.

We have found that as the outage has progressed, the more experienced individuals have assisted less experienced personnel in satisfying RWP requirements. For many jobs, to ensure personnel health and safety, continuous Radiation Protection coverage has been provided.

Continued enforcement of RWP Provisions will be accomplished to protect the health and safety of the individual worker, in that management will continue to monitor most closely those jobs where a significant hazard exists.

Sincerely yours,

  
R. R. Schneider  
Vice President -  
Electric Production

EWL/mtm

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