



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

John E. Maier
Vice President

TELEPHONE
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March 19, 1982

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19046

Attention: Mr. Thomas J. Martin, Director
Division of Engineering and Technical Programs

Dear Mr. Martin:

This letter is in reponse to the NRC Inspection report #50-244/81-10 received on February 18, 1982. The inspection was performed on May 26 - May 29, 1981 by Mr. R. L. Nimitz. This covers the two violations reported in Appendix A to the inspection report.

ITEM A

Contrary to 10 CFR 20.201(b), on May 26, 1981 no surveys of the airborne radioactivity concentrations were made to determine if several workers performing grinding of the 'B' Steam Generator tube sheet under Special Work Permit No. 2181 would inhale radioactive material in excess of the limits of 20.103. Radioactive material on the tube sheet surface produced dose rates estimated to be as high as 100 rads/hour.

Although air samples had not been taken during this particular operation, air samples taken during previous work in this area and data from previous work under similar conditions were used to evaluate the hazards to the individuals working in the steam generator.

To protect the workers, air handling equipment was in place which creates an inward flow of air to the steam generator channel head of approximately 1000 CFM. Air supplied hoods were also in use for all personnel performing work in the steam generator. These safety measures have been used in the past several years and have always provided adequate protection for any work in the generator.

Subsequent to the inspector's finding, air samples were taken and an evaluation performed. Using the most conservative measurement, all workers performing this work were exposed to less than 0.15 MPC hours. On May 26, 1981 we were in compliance with 10 CFR 20.201(b).

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ITEM A (cont.)

To preclude reoccurrence, the technicians were instructed to insure air samples were taken during the performance of any new or unusual work in the steam generator.

ITEM B

Contrary to 10 CFR 20.409(b), 19.13 (a), and 20.202, on February 2, 1981 the licensee transmitted reports to two individuals pursuant to 20.409(b) that did not include their extremity radiation exposure data.

Upon investigation, it was found that the extremity doses for these individuals had been entered on the permanent records after the termination letters had been issued. The individual making the entry did not realize that the letters had been sent and therefore did not issue a revised termination letter.

On May 29, 1981 a review of all records having extremity doses during the period in question was completed. New termination letters including the corrected extremity exposures were sent to the individuals and the NRC. Therefore, compliance was achieved on May 29, 1981.

To preclude reoccurrence, all personnel in dose records were advised that any changes or updates made to exposure records which have had termination letters issued require a corrected letter to be sent to the individual and to the NRC.

Subsequent inspections by the NRC and RG&E's Q.C. have turned up no further violations of this type.

Very truly yours,


John E. Maier

Subscribed and sworn to me
on this 19th day of March, 1982



LYNN I. HAUCK
NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1982

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