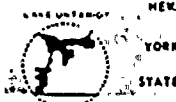




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



TELEPHONE
AREA CODE 716 546-2700

May 29, 1990

Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Martin:

Routine Inspection Report 50-244/90-07, Appendix A, stated in part:

As a result of the inspection conducted on April 16 to 20, 1990, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Technical Specification 6.11, Radiation Protection Program, states, in part, that "Radiation control procedures shall be prepared and made available to all station personnel or other persons who may be subject to radiation exposure at the station. The program shall be adhered to for all operations involving personnel radiation exposure."

Radiation Protection Procedure HP-1.2, "External Exposure Limits", states in Section 6.2.4.2 that personnel having a completed Form NRC-4 shall be administratively limited to 2000 mRem per calendar quarter.

Contrary to the above, on March 24, 1990, an individual with 1672 mRem of occupational exposure for the first calendar quarter of 1990 was given an administrative dose limit of 1973 mRem for the first calendar quarter of 1990. This resulted in the individual's exposure being administratively limited to 3645 mRem for the first calendar quarter of 1990.

Rochester Gas & Electric Corporation agrees with the violation as stated.

1. Cause of Violation

a. The root cause of the violation was personnel error.

2. Event Description

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Q PDC



Incoming personnel are required to provide documentation of current quarterly exposure along with other past exposure data in order to obtain a TLD for work in radiologically controlled areas at Ginna.

Procedure HP-1.2 requires processing historical dose data into the RDMS system (a computerized dose tracking system) on two separate screens.

In the case in question, the worker had both a record dose (1645 mRem rather than 1672 mRem as reported in the inspection report) and an estimated dose (10 mRem). On one screen, both doses were properly entered, on the second screen (which was used to produce the Form 4), only the 10 mRem estimated dose was entered. The Form 4 attachment letter produced was then reviewed by the worker who signed the document as being accurate.

The information from the Form 4 was then used to determine the workers administrative dose limit of 2000 mRem as described in the violation.

3. Corrective Actions

- a. When this error was determined, the worker's records were immediately corrected. The worker received no significant exposure for the time while the error occurred.
- b. The records for all workers processed in from January 1, 1990 until the date of discovery of the error were confirmed accurate. No further errors were discovered.
- c. Rochester Gas and Electric has since instituted the following corrective action. All NRC Form 4 dose histories for the quarter will be totaled by one dosimetry clerk and any estimated doses will be added to the official record. The maximum quarterly dose allowed will be 1000 mRem, when estimated doses are included, minus this total. These calculations will then be checked by either an additional dosimetry clerk or HP technician, and signed off as such prior to being made official. This value will then be updated when the official records for the quarter are made available. The worker's quarterly limit will also then be updated.
- d. In addition to this, the following longer term corrective actions are planned to the dosimetry software:
 - 1) Automatically total all the dose histories of an individual (yearly, quarterly, lifetime).
 - 2) Improve the data input sequence.

- 3) Add any estimated doses for a quarter to the official records and calculate the administrative limit.
- 4) Correct the quarterly limit when official records are available.

These upgrades are anticipated to be completed by January 1, 1991. We are currently in full compliance.

Very truly yours,

Robert C. McCreedy
Robert C. McCreedy
Division Manager
Nuclear Production

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Ginna USNRC Senior Resident Inspector

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