

AITS F03048783

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

September 16, 1983
AEP:NRC:0794

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315/50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO THE NRC's FEBRUARY 28, 1983 AND
SEPTEMBER 2, 1983 LETTERS REGARDING
PERSONNEL ADMITTANCE WITH FACIAL HAIR

Mr. James G. Keppler
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter is in response to Mr. J. A. Hind's letters of February 28, 1983 and September 2, 1983 with regard to our policies on facial hair. The February 28, 1983 letter requested that the licensee submit a statement of their facial hair policy, the basis for the policy, and the applicable implementing procedures. The September 2, 1983 letter referred to the routine safety inspection (Report No. 50-315/83-15; 50-316/83-16) conducted by Region III Staff members on August 3 - 5, 1983 of the activities at the Donald C. Cook Nuclear Plant, Units 1 and 2. The following deviation from commitment was cited in the September 2, 1983 letter:

DEVIATION

"During an inspection exit meeting on May 6, 1983, you stated that a written response to an NRC Region III letter dated February 28, 1983, concerning the plant's facial hair policy, would be provided within one month (June 6, 1983).

Contrary to this, as of August 5, 1983, no response to the NRC Region III letter dated February 28, 1983, had been received."

In addition, the September 2, 1983 letter requested us to confirm in writing, within ten days of receipt of the letter (i.e., ten days from September 6, 1983), that all duly authorized NRC representatives will be granted unfettered access to our plant facilities as may be necessary in the performance of their official duties. The letter also stated that no other response to the deviation was necessary. Our response to Mr. Hind's letters and to the deviation is presented below:

JSK
8309300167

SEP 21 1983

RESPONSE

The present written policy at the D. C. Cook Nuclear Plant is that no individual will be given unrestricted access of the plant unless he is clean shaven. This was established by L. J. Matthias' memorandum dated October 13, 1982 and J. D. Gore's memorandum dated October 21, 1982.

The basis for this policy is consistent with the NRC's Regulatory Guide (R.G.) 8.15 dated October 1976, and OSHA STD. 1910.134. Note b of Table 1 of R.G. 8.15 states, in part, that the respirators are to be used "Only for shaven faces and where nothing interferes with the seal of tight-fitting facepieces against the skin..." Part "5(i)" of OSHA STD. 1910.134, section "e", which addresses "Use of Respirators", states, "Respirators shall not be worn when conditions prevent a good face seal. . Such conditions may be a growth of beard, sideburns" The basis for this policy was also established with the experience gained from dealing with the issue until it evolved into a policy that was consistent and enforceable.

NRC Inspection Report 50-315/80-23; 50-316/80-19, dated May 26, 1981, indicated to us that "indifferently enforced facial hair standards" was a "significant weakness". To be more specific, the following are excerpts from NRC Inspection Report 50-315/80-23; 50-316/80-19:

(1) The report transmittal letter from Mr. James G. Keppler stated, in part, "During the period December 8 to December 19, 1980, the NRC conducted the special appraisal of the health physics program at the D. C. Cook Plant...to determine whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement...describing your corrective action for each significant weakness identified in Appendix A..."

(2) Appendix A, paragraph 3, to the report stated, in part, "Significant weaknesses observed related to exposure control are...indifferently enforced facial hair standards."

(3) Section 4.3 of the report stated, in part, "...some problems were observed by the appraisal team. In order to become qualified for respirator usage, an individual must be...fit tested...The appraisal team noted that some plant personnel, who were respirator qualified, were sporting chin whiskers which should invalidate their qualification since the mask fit test and use procedures...require that masks be issued to "clean shaven personnel only." During the appraisal, an apparently unshaven individual was observed removing a full-face respirator after leaving an airborne radioactive area (lower containment). At the request of the appraiser, the individual was mask fit tested. Although the individual attained the protection factor required to pass the test, it had decreased ten fold from that achieved during his last fit test. These observations and others made of plant and contractor personnel indicated that RP personnel should pay more

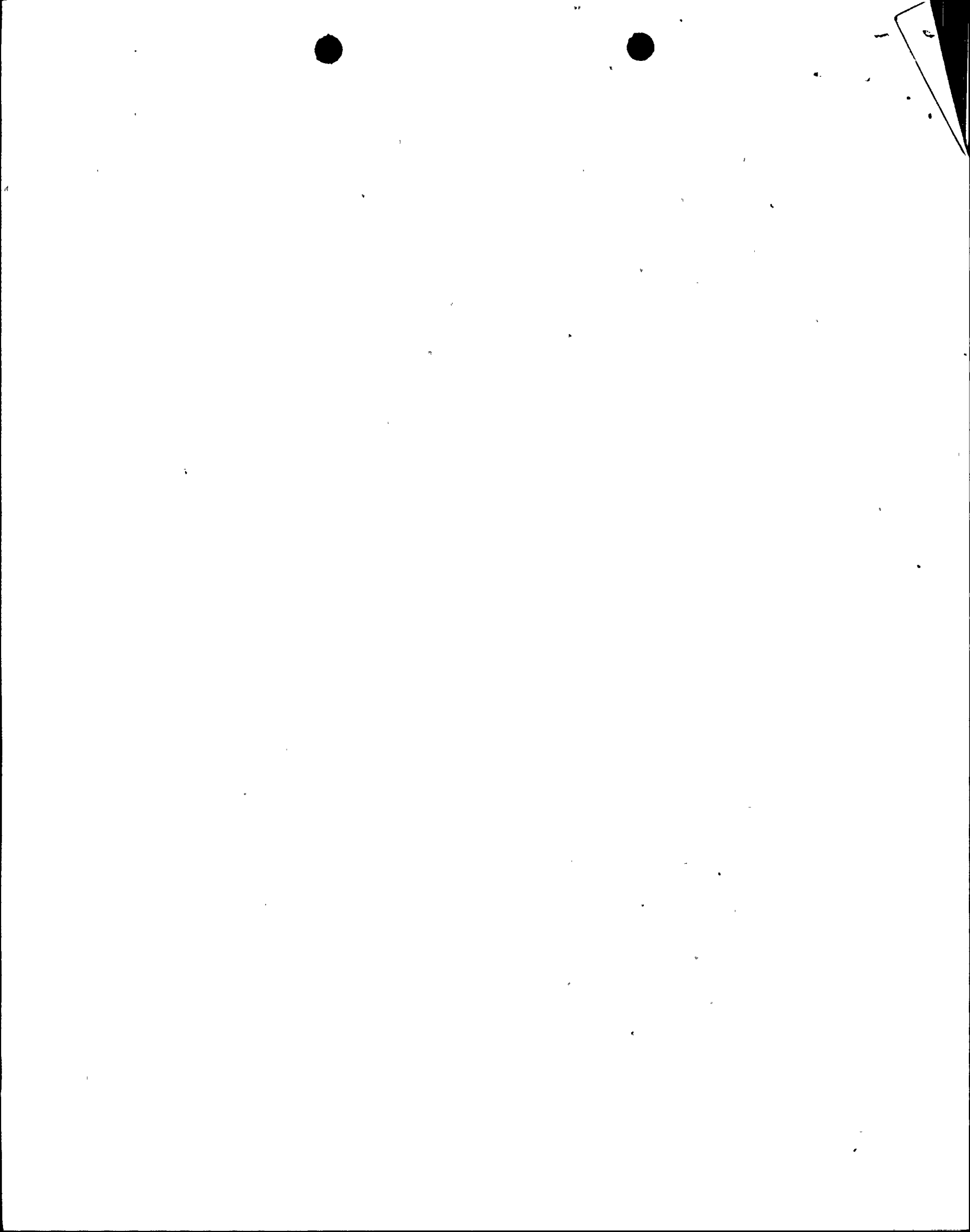
attention to the state of facial hair on persons when issuing respirators...Based on the appraisal findings, improvements are needed to achieve a fully acceptable internal dosimetry program. The needed improvements include better enforcement of facial hair standards for qualified respirator users..."

In response to the Inspection Report 50-315/80-23;50-316/80-19, the Plant Manager issued a memorandum on July 7, 1981 which led to an unwritten policy that being clean shaven was a prerequisite to gaining access into controlled areas. This developed into a generally accepted, unwritten policy of being clean shaven for unrestricted access to the plant.

In October 1982, there were a number of problems getting contract personnel to accept the unwritten facial hair policy. Therefore, a written policy was established by the L. J. Matthias and J. D. Gore memoranda.

Prospective plant employees are apprised of the policy during pre-employment interviews. Contractors and business agents have been instructed to ensure that craft workers are advised of the policy prior to arrival at the plant for RP training/work. Casual visitors are advised of the policy promptly on determining that they wish or need to enter a radiologically controlled area. To reinforce this notification and the policy, individuals are reminded of it during the nuclear general employee training. The training is required for all employees who are given unrestricted access of the plant. The individuals are not badged (i.e., have their picture taken, given an I.D., and allowed unrestricted access to the plant) unless they are clean shaven. This has proven to be a consistent and effective way of implementing the policy.

Specifically, in response to your September 2, 1983 request for confirmation that all duly authorized NRC representatives be granted unfettered access to our plant facilities as may be necessary in the performance of their official duties, we intend to fully assist the NRC's needs in the fulfillment of their official duties. Access to a nuclear facility involves a number of restrictions. Within these restrictions access will be granted. The restrictions are developed from regulatory requirements, commitments, guidance, other enforcement precedent, etc. In light of the above regulatory guidance (i.e., R.G. 8.15) and enforcement precedent (i.e., NRC Inspection Report 50-315/80-23; 50-316/80-19), we request that the NRC be consistent with their regulatory policies concerning facial hair and respect our policy and obligation for insuring adequate protection for the health and safety of all personnel entering the plant and the public. Furthermore, we request that the NRC consider the negative impact on plant personnel morale if NRC personnel are permitted to deviate from an effective policy, established to protect their health and safety. In addition, this type of deviation hinders management's ability to establish and enforce effective policies which are not rooted in regulatory or statutory requirements (e.g. restricted entry of illiterate persons or restricted entry of controlled substances).




With specific regard to NRC personnel requiring unrestricted access to the Donald C. Cook Nuclear Plant facility, we are hereby requesting that the NRC staff do one of the following:

- (1) Comply with our facial hair standards (i.e., do not wear facial hair other than conservative mustaches); or
- (2) For those NRC staff personnel who do not comply with our facial hair standards, and desire unfettered access to controlled areas, we would like to be assured that those NRC personnel have brought with them special respiratory equipment (i.e. not contingent upon facial seal) for which they been properly qualified and fitted to use; or
- (3) For those NRC staff personnel who do not comply with our facial hair standards; desire unfettered access to controlled areas; and do not comply with paragraph (2) above, provide us with signed statements from the NRC and the personnel involved, stating that I&MECo, American Electric Power Service Corporation, and their affiliates are released of all liabilities and that the NRC assumes full responsibility related to and involving the health and safety of those NRC personnel.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,


M. P. Alexich
Vice President

MPA/edg

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
E. R. Swanson, NRC Resident Inspector - Bridgman