

## NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK300 ERIE BOULEVARD, WEST  
SYRACUSE, N. Y. 13202

July 31, 1984

Dr. Thomas E. Murley  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19405

Re: Docket No. 50-220  
File No. IAL-80-38

Dear Dr. Murley:

In accordance with Inspection Report 83-27 and discussion between Mr. R. L. Nimitz of your office and Mr. E. W. Leach of NMPC on 5/15/84 and 7/2/84, we are hereby transmitting our final Summary Action Plan Report, summarizing our efforts in upgrading the Radiation Protection Program at Nine Mile Point.

ACTION PLAN - RADIATION PROTECTION PROGRAM - NINE MILE POINT NUCLEAR STATIONI. RADIATION PROTECTION ORGANIZATION

The Chemistry and Radiation Management additional positions proposed in the five-year staffing plan, drafted in August, 1983 have been approved. Hiring of supervisory personnel will commence as soon as salary level and job description are also approved.

As previously reported, the technician work force has been divided into Radiation Protection Technicians and Chemistry and Radiochemistry Technicians, currently staffed at 27 and 13 technicians, respectively.

Additional technician hiring is on-going, to obtain a total of 80 by 1986 for two-unit operation.

Our letter of May 7, 1981 indicated that a corporate position for a certified health physicist was created and the personnel search was underway. Since then, four corporate health physicists were hired (one replacement has occurred). Although several individuals have over three years of professional health physics experience, none are certified at present. However, one individual from the Corporate HP Group took Part I of the certification exam in June 1984. In addition, seven other NMPC personnel (from the Chemistry and Radiation Management, and Training Departments) took Part I of the ABHP exam, five took Part II (Power Reactor), and one took Part II (Comprehensive), also in June 1984. In the future, hiring preference will be given to CHP candidates, but it is doubtful that one will be obtained via this route.

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## II. PERSONNEL SELECTION, QUALIFICATION, AND TRAINING

The selection criteria and qualification for advancement, for the technician job series, were revised, strengthened, and made specific to Radiation Protection and to Chemistry in the Job Specification revision of 1/30/83, reported in the first quarter, 1983 report. The authority and responsibility of the two technician series is specifically included in the job specification, and the prerequisites have been significantly upgraded. The Radiation Protection training and retraining program is defined by Administrative Procedure APN-10I, (Rev. 0 1/31/84). The Chemistry and Radiochemistry training and retraining program is defined by APN-10J (Rev. 0, 1/31/84). Implementation of both of these procedures is in progress, and will be tracked via NRC Open Item 83-27-01.

### III.A. EXTERNAL EXPOSURE CONTROL

Improvements to the external exposure control program have been initiated to improve assignment of badges for monitoring the Whole Body and Extremities, to improve the program for spiking dosimetry devices, and to improve the posting of Radiation Areas and High Radiation Areas.

The in-house system for processing TLD's may become the system of record if it can be economically and technically justified. If not, a third-part supplier of dosimetry devices will be retained.

### III.B. INTERNAL EXPOSURE CONTROL

Internal exposure control was upgraded by establishing a WB Counter calibration verification program, establishing an upgraded WB counting schedule monitored by a Respiratory Status Report, and improvements in procedures for bioassay.

### III.C. RESPIRATORY PROTECTION PROGRAM

A policy statement on respiratory usage was added to the Station Administrative Procedures.

Respiratory protective equipment and other program procedures were revised to address identified inadequacies.

In a subsequent inspection, the respirator cartridge testing equipment was identified as questionable since it used NaCl as the test medium rather than DOP. NRC Open Item 83-27-04 was initiated to track this item. A new quantitative respirator filter testing unit has been purchased and put into service (6/16/84).

This tester uses 0.3 micron thermally-generated mono-dispersed dioctyl phthalate aerosol to test the adequacy of selected particulate filter cartridges. Since this tester utilizes the same testing media as the original filter certification tests, we feel that this item has been adequately resolved. We await final closeout of this item pending inspector evaluation.

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THE HISTORY OF THE UNITED STATES

The history of the United States is a story of growth and change. It begins with the first settlers who came to the continent in search of a new life. They found a land of vast resources and a people who were different from them. Over the years, the United States has grown from a small colony to a great nation. It has fought wars, made mistakes, and achieved great things. The story of the United States is a story of the human spirit and the power of dreams.

THE FOUNDING OF THE NATION

The United States was founded by a group of men who believed in the principles of liberty and justice for all. They fought a war to free themselves from British rule and then they wrote a constitution that would guide the new nation. The Founding Fathers were men of great vision and courage. They knew that the road ahead would be difficult, but they were determined to create a better world for themselves and for their children.

THE GROWTH OF THE NATION

As the United States grew, it faced many challenges. It fought wars with other nations and with its own people. It struggled to find a way to balance the interests of different groups of people. But through it all, the United States remained a nation of hope and possibility. It was a land where anyone could make their own destiny.

THE CHALLENGES OF THE FUTURE

The United States is a young nation, and it will face many challenges in the future. It will have to deal with the problems of a changing world. It will have to find ways to protect its freedoms and its values. But it will also have the opportunity to make a difference in the world and to create a better future for all.

The history of the United States is a story of the human spirit and the power of dreams. It is a story of growth and change, of struggle and achievement. It is a story that inspires us to do better and to be better.

The United States is a land of opportunity and hope. It is a land where anyone can make their own destiny. It is a land where the dream of a better world is always within reach. The history of the United States is a story of the human spirit and the power of dreams. It is a story that inspires us to do better and to be better.

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### III.D. SURVEILLANCE CONTROL

The Self-Monitoring program was revised to provide for recording of surveys made by self-monitors and to provide more complete survey data at entrances to High Radiation Areas.

Procedures for existing and new surveillance equipment--air samples, friskers, and radiation survey equipment--were revised or developed to provide detailed documentation of calibrations.

Sensitivity of instruments for personnel monitoring for contamination was improved by switching to thin window detectors.

Measurements and documentation of survey results were improved by issuing a detailed procedure for performance of radiological surveys.

### IV. THE ALARA PROGRAM

A policy statement on ALARA was added to the Station Administrative Procedures.

The position of Dosimetry and ALARA Coordinator has been divided into Dosimetry Coordinator and ALARA Coordinator positions.

A full-time ALARA coordinator has been on-site since March, 1984. ALARA reviews have also been performed by other Site and Corporate personnel, with assistance as required by Contractor personnel.

The initial ALARA program procedures were issued in March 1984. Implementation and further program development is underway, based on, for example, experience gained during the extended Recirculation Piping Replacement outage.

### V. RADIOACTIVE WASTE MANAGEMENT

A Supervisor Radwaste Operations and an assistant have been assigned responsibility for Radioactive Waste Management. A dedicated Radwaste Operator crew has been assigned to the radwaste buildings.

A comprehensive series of Waste Handling Procedures has been developed for operations associated with processing, packaging and shipping radwaste.

### VI. PROCEDURE REVISION AND UPGRADE

All department procedures in existence at the time of the HP Appraisal have been revised. New procedures have been formulated to control more closely the specific work practices associated with significant tasks. It is expected that procedure maintenance will continue to be a significant portion of the station workload and has been factored into the increases in staff which have taken place and are planned for the future.

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#### VII. CALIBRATION AND USE OF INSTRUMENTATION

The instrument calibration facility was upgraded by purchase of a high range calibration device and the well calibration procedure was evaluated and revised.

Counting room instrumentation has been upgraded, and the associated procedures have been made more comprehensive.

Process and effluent monitoring capability is in the process of being upgraded. Procedures for calibration of remaining monitors have been revised to improve calibration documentation.

Portable survey instrument and sampler procedures have been written or revised to resolve identified deficiencies.

A detailed survey procedure was established to standardize the methodology and instrument selection, use, and interpretation.

#### VIII. WORK AREA RADIATION CONTROLS

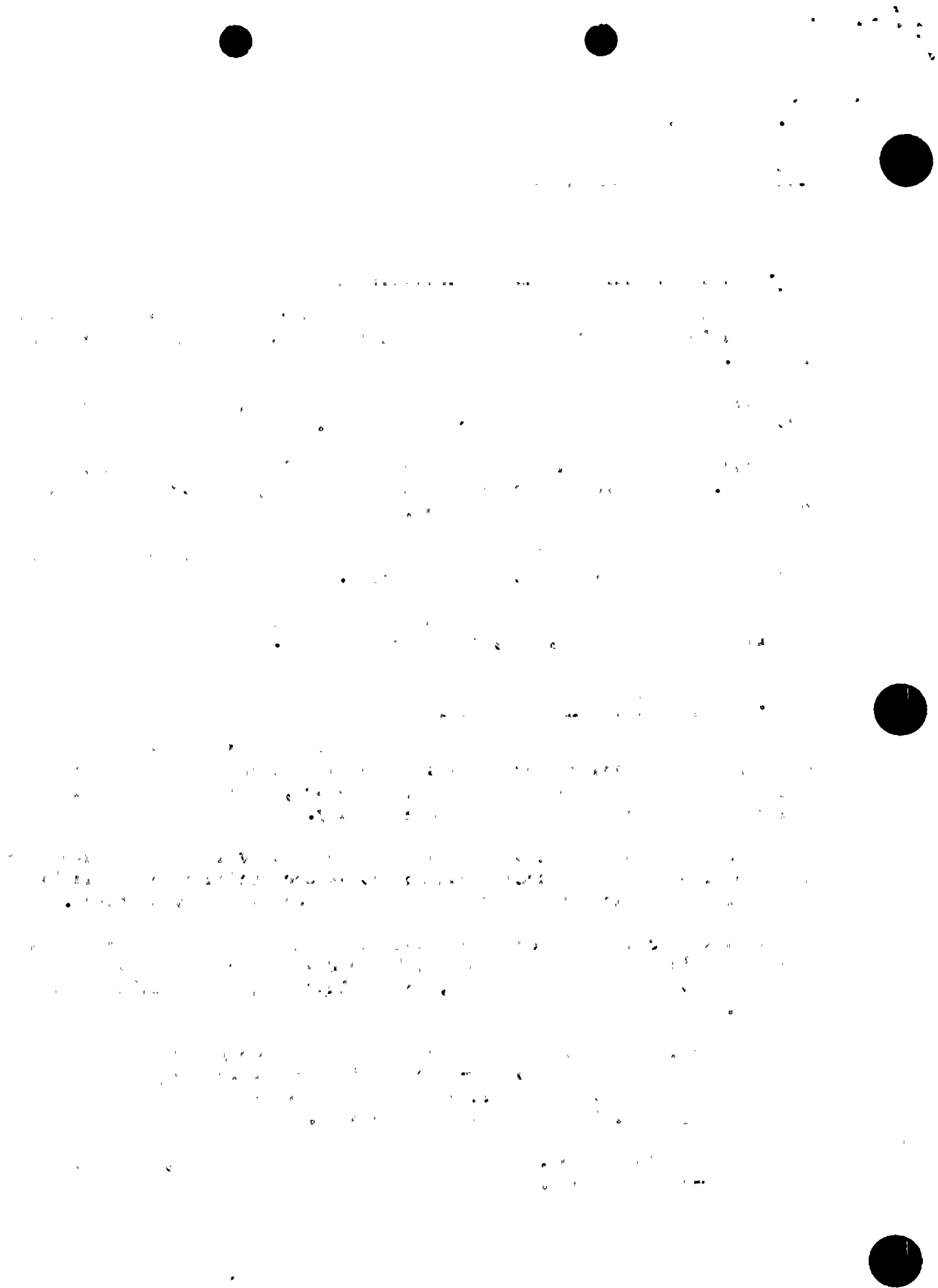
The laundry facility RWP requirements have been upgraded, and continued surveillance of laundry workers has noted consistently low whole body counts confirming low airborne activity and, therefore, indicating satisfactory control of radioactive material in the laundry.

Exit point contamination control has been improved by using thin window detectors, by providing access control point technician coverage during outages, and by installing portal monitors at the security building.

High Radiation Area access control has been enhanced by reducing the station HRA's required to be locked, by improving the survey postings at entrances to High Radiation Areas, and by improving the auditing of HRA entry records.

Monitoring of adherence to procedure is now accomplished by regular RWP compliance audits and by follow-up mechanisms requiring response to deficiencies (the Non-conformance Event Transmittal) and more serious violations (the Radiological Incident Report).

Radiation Protection, and Chemistry and Radiochemistry, Technicians now provide 24-hour coverage.





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Specific questions concerning status of NRC open items in the Radiation Protection Program should be addressed to Mr. Edward W. Leach at the Nine Mile Point Nuclear Station.

We appreciate the assistance given to our personnel by the NRC inspection staff in defining and verifying the required corrective actions implemented during the Action Plan period.

Sincerely yours,



T. E. Lempges  
Vice President  
Nuclear Generation

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