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USNRC REGION
ATLANTA, GEORGIA

81 July 6, 1981 : 1

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation



Georgia Power

the southern electric system

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/50-366
Inspection Report 81-10

ATTENTION: Mr. James P. O'Reilly

Gentlemen:

The following information is submitted in response to several apparent items of noncompliance identified in your inspection report no. 50-321/81-10 and 50-366/81-10.

ITEM A

10 CFR 20.203(b) requires that "Each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION (OR DANGER) RADIATION AREA. 10 CFR 20.202(b) (2) states that radiation area means any area accessible to personnel, in which there exists radiation at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirem, or in any 5 consecutive days a dose in excess of 100 millirem."

Contrary to the above, the following radiation areas were not conspicuously posted:

1. On April 13, 1981, a general area eighteen inches from the south steam discharge header bank in the Unit 2 reactor building read 5 to 10 millirem per hour, and
2. On April 13, 1981, a manway opening to the sump in the Unit 1 radwaste building read 50 millirem per hour at knee level and 600 millirem per hour in the manway opening. Radiation levels at the gonads and the chest were greater than 5 millirem per hour.

This is a Severity Level V Violation (Supplement IV.E.2.).

RESPONSE

Georgia Power Company does not agree that the identified examples constitute noncompliance with 10 CFR 20.203(b). It has long been our policy to post entrances to the reactor and radwaste buildings with "caution-radiation area" signs identifying these buildings as real or potential radiation areas. It is our concern that posting each

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RESPONSE (ITEM A) (Continued)

localized radiation area will result in desensitizing plant workers to posted signs. Since the ultimate purpose of posting radiation areas is to provide workers with information concerning radiological working conditions, any desensitization is not in the best interests of an effective exposure control program.

Georgia Power Company recognizes that the interpretation of 20.203(b) is controversial and will therefore take action in two specific directions:

1. Georgia Power will request, by separate letter, a specific interpretation of 10 CFR 20.203(b) be made by the General Counsel pursuant to 10 CFR 20.6.
2. Pending the results of Item 1, Georgia Power will post signs at individual radiation areas in the reactor and radwaste buildings. The initial posting of areas was completed on May 20, 1981. The radiation protection staff will be informed of the continued need to post localized areas until a formal interpretation is available.

ITEM B

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33. Regulatory Guide 1.33, Appendix A states in part that radiation protection procedures should be provided.

Contrary to the above, radiation protection procedures were not established, implemented and maintained in that:

1. On April 15, 1981, alarm setpoints on 16 of 25 RM-14 friskers were 50% to 150% greater than 200 cpm above background required by plant procedure HNP-8114 paragraph G.7.d. Background radiation levels on April 15 were within 10% of levels recorded by the licensee at the time the alarm setpoints were determined.
2. On April 13, 1981, a Plant Equipment Operator was observed exiting the Unit 2 Backwash Receiver Pit and was not signed in on standing Radiation Work Permit (RWP) 2-81-650 nor was he wearing the proper protective clothing specified on the RWP as required by HNP-8008, paragraph H.

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ITEM B (Continued)

3. On April 15, 1981, 13 of 15 workers exited the Unit 1 Torus and failed to perform whole body frisks prior to leaving the Radiation Control Area as required by HNP-8005, paragraph G.3.b.(3).
4. On April 13 and 14, 1981, a contaminated area at the drum capping room in the Unit 2 radwaste building was not conspicuously posted as required by HNP-8003, paragraph J.2.

This is a Severity Level V Violation (Supplement IV.E.2.). A similar item was brought to your attention by our letter dated September 12, 1980.

RESPONSE

The alleged violations did occur as stated in the report. The primary reasons for the violations were personnel error, procedure inadequacy and insufficient procedure enforcement. Corrective measures for each violation are discussed below.

ITEM B.1

The immediate corrective step for violation B.1 was to set each frisker alarm, except those stations at manned control points, as close to 200 cpm above background as possible. Frisker alarms at the manned control points, i.e. torus, drywell, refuel floor, condenser bay, and turbine bay, where whole body surveys were required, were set at about 100 cpm above background. Additionally, the technicians responsible for the setting of these alarms were instructed in the importance of maintaining these instruments in accordance with the procedure. A review of procedure HNP-8114 was made and the procedure revised to reflect consideration of the following:

- (1) Purpose of the frisker being installed within the buildings.
- (2) Purpose of the alarm and its setpoint.
- (3) Difficulty in maintaining alarm settings where background conditions may change.
- (4) Present training of personnel to respond to frisker readings and alarms.

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RESPONSE (ITEM B.1) (Continued)

Friskers installed where their primary function is to control contamination spread from one area to another within the buildings will have their alarms set near the top end of the scale. For friskers used in this mode, the alarm serves no useful function. In high or fluctuating background areas, setting the alarm point near enough to the background level to be meaningful would result in spurious alarms and inordinate HP staff time changing alarm setpoints as well as tending to have the workers rely on the frisker alarm rather than watching the meter response. Friskers installed at locations where whole body surveys are routinely performed and at exits to the operating buildings will have their alarms set about 100 cpm above background. Where deemed appropriate, any frisker alarm may be set at a more conservative value.

Full compliance was achieved on April 20, 1981. The revision to procedure HNP-81.4 was approved on June 19, 1981.

ITEM B.2

The immediate corrective action for violation B.2 was to reinstruct the Plant Equipment Operators (PEOs) in the requirements for using blanket Radiation Work Permits (RWP). To avoid further noncompliance for failure to sign in and out on the sign-in sheet for blanket RWP's, the PEOs have been instructed to carry with them on their rounds a sign-in sheet for the appropriate RWP. It has been stressed to the PEOs that by completing the data on the sign-in sheet, they have understood and will comply with all requirements of the RWP, including protective clothing. Additionally, the use of blanket RWP's were discussed in the June Operations Department Safety Meeting, June 29, 1981.

Full compliance was achieved on April 24, 1981.

ITEM B.3

The immediate corrective action for violation B.3 was as follows:

Technicians on duty at each of the control points where full protective clothing was required were firmly reminded of their duty of assuring that workers perform a whole body frisk after removing their protective clothing. One technician was assigned, as his major duty, the responsibility for assuring that workers perform the survey. Larger signs were also posted to remind workers of their responsibility for

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RESPONSE (ITEM B.3) (Continued)

surveying themselves. Increased surveillance on control point activities by the health physics supervisory staff was initiated and conducted throughout the remainder of the outage.

It has been, and will continue to be, stressed to all personnel that failure to perform a whole body survey after wearing full protective clothing will be subject to strong disciplinary action in the future. This will be a progressive disciplinary policy starting with warnings through dismissal for chronic or flagrant violations.

VIOLATION B.4


The immediate corrective action for violation B.4 was to properly post the area. An investigation revealed that the area had been posted; however, the contaminated area sign had fallen down and was not replaced when workers moved drums into the area. The signs have since been posted in a location in which they will not be easily disturbed during work activity in the area.

Full compliance was achieved on April 14, 1981.

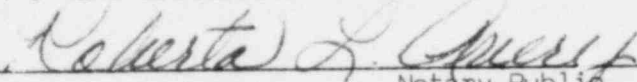
If you have any questions or comments in this regard, please contact my office.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 6th day of July, 1981.



Notary Public

Notary Public, Georgia, State at Large
My Commission Expires July 28, 1984

MJB/mb

xc: M. Manry
R. F. Rogers, III