



June 24, 1983  
JAFP 83-0667

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King Of Prussia, PA 19406

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

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333, NRC INSPECTION NO. 83-08

Gentlemen:

With reference to the routine inspection conducted by Dr. M. McBride of your office on March 21 - 25, 1983 at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated May 27, 1983 as received by the undersigned on May 31, 1983.

A. The Power Authority agrees with the finding.

The fundamental cause of this violation was: Lack of a complete work description on the Radiation Work Permit (RWP) request form from which the RWP was subsequently written.

The immediate corrective actions for this violation were as follows:

1. Work was halted.
2. The workers received whole body counts which verify there was no measurable uptake of radioactive material into the body.
3. An investigation was conducted which concluded that the cause of high airborne concentrations was grinding on the valve, an evolution which was not included in the work scope.

4. Engineering controls (containment and ventilation) and increased surveillance were instituted for the remainder of the job.

Permanent corrective actions are as follows:

1. On June 10, 1983 a new RWP request form requiring more detail as to the scope of work and specific work functions to be performed was implemented.
2. On June 10, 1983 that part of the formal ALARA program which analyzes jobs for engineering control requirements was implemented.

- B. The Power Authority agrees with the finding.

The fundamental cause of this violation was inadequate procedural guidance in the use of breathing air supplied hoods and/or suits.

The immediate corrective action for this violation was to stop the use of air supplied hoods pending the implementation of permanent corrective actions.

Permanent corrective actions were as follows:

1. On June 3, 1983 a revision to RPOP-6, "Respiratory Protection Procedure" was issued which ensures proper setup and use of air hoods, specifically the pressure range at which the regulator is to be set.
2. On June 3, 1983 a revision to RPOP-6, "Respiratory Protection Procedure", was issued which requires that breathing air manifolds in use have calibrated pressure gauges and NIOSH/MSHA approved air hoses.

- C. The Power Authority agrees with the finding.

The fundamental cause of this violation was: Failure to adequately train personnel in the requirements for labeling of containers.

The immediate corrective actions for this violation were as follows:

1. Properly label the containers in question.

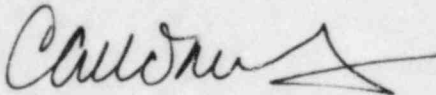
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2. Train the individual involved in filling the containers in proper labeling.

Permanent corrective action is to include in the required reading program for all non-licensed and licensed operators reading of 10 CFR 20.203(f). This section sets forth the requirements for control and labeling of containers of license material. This action will be completed by August 5, 1983.

Very truly yours,



CORBIN A. McNEILL, JR.  
RESIDENT MANAGER

CAM:EAM:jaa

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

*Martin  
What about  
PSP-9? Was  
it mod. tied?  
If it was, include  
our understanding of  
our acknowledgment  
of it. If it wasn't,  
this response is  
unsat since it  
does not assure that  
response will always be  
directed to 10.16  
no 20.203(f).  
Wh/1  
7/1/83*

*John!  
change Confirmed PSP-9  
during inspection  
83-14 - although  
not documented as  
licensee had not  
responded to NOV  
at that time  
MPP/TM  
7/3/83*