



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 3, 1990

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report
Nos. 50-373/89024 and 50-374/89023
Radiation Protection Program
NRC Docket Nos. 50-373 and 50-374

Reference (a): L.R. Greger letter to Cordell Reed dated
February 6, 1990.

Dear Mr. Davis:

This letter is in response to the inspection conducted by Messrs.
R. Paul and M. Kunowski November 16, 1989 through January 5, 1990 of the
LaSalle County Station Radiation Protection program. Reference (a) identified
certain weaknesses associated with the suppression pool inspection conducted
on December 26, 1989.

Although no response was requested, Commonwealth Edison is submitting
the following Attachment to describe the actions which have been taken to
address the identified weaknesses and strengthen the performance in these
areas.

Very truly yours,

Wayne E. Morgan

W.E. Morgan
Nuclear Licensing Administrator

Attachment

cc: Senior Resident Inspector - LSCS

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ATTACHMENT

Inspection Report 374/89023-01 identified weaknesses associated with the suppression pool inspection conducted on December 26, 1989 in which two workers received a small intake of radioactive material while working in the pool. The paragraphs below describe the actions which have been taken to strengthen performance in these areas.

Absence of Professional HP Coverage: In the above mentioned event the station had Professional Health Physics (HP) involvement during the planning stages and during some portions of the work. The Health Physics Services Supervisor has since then discussed with both Lead Health Physicists the expectations regarding Professional HP coverage on significant jobs along with the role of the HP. This role is to provide an oversight function of activities to aid the station Radiation Protection Technicians (RPTs) during both the planning and execution phase of the work.

Failure to take early nasal smears: As the report indicated nasal surveys were taken to assess the possibility that an intake had occurred. These surveys were performed after several decontaminations were performed. During the weekly communications session with the RPTs, the entire suppression pool event was discussed. The importance of the need to perform early nasal surveys was emphasized. In addition to the verbal communications, LaSalle Radiation Procedure (LRP) 1470-6 was revised to require nasal surveys prior to additional decontamination activities unless the contamination is due to a hot particle in the facial area. To minimize dose to the skin of the whole body, the removal of the particle will take priority.

Failure to perform a whole body count after repeated failures on the day of the event: Procedures LRP-1240-25 "Operation and Calibration of the Eberline PM-7 Portal Monitor" and LRP-1470-5 "Identification of Radioactive Particles" were revised in January 1990. These revisions included a brief discussion of the following:

- The differences between gatehouse and whole body monitoring equipment regarding primary radiations monitored.
- The possibility that a whole body count of an individual may be required when the source of a radiation alarm cannot be located.
- A requirement that a Health Physicist be contacted to authorize the release of an individual from site when the above conditions exist.

These changes have been discussed with the RPT's and RP shift supervisors.