



VERMONT YANKEE NUCLEAR POWER CORPORATION

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RUTLAND, VERMONT 05701

2.C.2.1

FVY 82-66

REPLY TO:

ENGINEERING OFFICE

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FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

June 8, 1982

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Ronald C. Haynes
Regional Administrator

References: a) License No. DPR-28 (Docket No. 50-271)
b) USNRC Letter to VYNPC, dated April 7, 1982;
Health Physics Appraisal

Dear Sir:

Subject: Response to NRC Health Physics Appraisal

We are responding to the Health Physics Appraisal conducted at Vermont Yankee Nuclear Power Station during the period of September 22 through October 3, 1980, which is documented in Reference (b). Specifically:

AUDIT AREA:

A. Internal Exposure Control

Internal Dosimetry

Item 1: Calibration of the whole body counter at several activity levels ranging from 60 - 20,000 nCi is necessary (Section 3.2.1b).

Response: Necessary procedure revisions will be made to ensure that the whole body counter will be calibrated per ANSI N343. This will be accomplished by September 1, 1982.

Item 2: Increased emphasis must be placed on management oversight and wholebody counter operator training and retraining. The relationship of organ burdens to airborne exposures based on air sample analyses should be included in the training (Section 3.2.1b).

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Response: The plant Health Physicist has always reviewed exit whole body count data and routinely oversees whole body count operations. Increased emphasis on counter operator training and retraining including the relationship of organ burdens to airborne exposures has been initiated. Training programs will be utilized as available.

Item 3: Termination exposure reports issued pursuant to 10 CFR 19.13 must be more definitive than "no significant gammas in the spectrum." A correlation with minimum detectable intake should be included (Section 3.2.1a).

Response: This will require major computer modifications. These modifications will be completed and more definitive reports will be issued by January 1, 1984.

Item 4: Gamma ray spectra for Ru-Rh-106, Ba-La-140, and Ce-Pr-144 must be added to GAMANL-II library (Section 3.2.1b).

Response: These spectra will be added to the GAMANL-II library by January 1, 1984.

Item 5: A formal internal dosimetry program for non-gamma-emitting nuclides (e.g., H-3, Sr-90, and alpha emitters) is needed (Section 3.2.1a).

Response: Plant procedures will be revised to include an internal dosimetry program for non-gamma-emitting nuclides. This will be accomplished by August 1, 1982.

AUDIT AREA:

B. Respiratory Protection Program

Item 1: Supervisory review of respirator fit tests needs to be exercised to assure that assigned protection factors are appropriate (Section 3.2.3.4).

Response: Supervisors have always reviewed respirator fit test results to assure that protection factors are appropriate. At no time has respiratory protection approval been given to an individual whose protection factor was less than that listed in NUREG 0041.

Item 2: Respirator training involving an opportunity for hands-on experience is needed (Section 3.2.3.2).

Response: Training on the use of respirators including practical experience has always been part of the respirator fitting program.

AUDIT AREA:

C. ALARA Program

Item 1: A formal ALARA Program that conforms to the guidance in Section C of Regulatory Guide 8.8 and Regulatory Guide 8.10 needs to be developed, documented and implemented; both plant and corporate personnel should be involved in this program (Section 5.2).

Response: A new guideline has been issued by the Yankee Atomic Electric Company for the corporate "Radiation Protection Review Committee" and that committee now meets on a more regular basis.

The Yankee Atomic Electric Company has drafted and circulated for review, a guideline describing the corporate ALARA Program. This guideline should suffice to address the Commission's concerns of more corporate involvement in ALARA.

An ALARA Committee has been formed which reports directly to the Plant Manager. This committee consists of the Plant Manager as Chairman, the Plant Health Physicist as permanent member, and one member from each of several departments. Procedures have been changed such that ALARA responsibilities are better defined by management and to plant staff.

As Vermont Yankee was being built, the staff applied the philosophy of ALAP (As Low As Practicable) to procedure writing, startup and testing. The philosophy continues in present operation of the plant. When the AEC began emphasizing ALAP, Vermont Yankee was already in compliance. Later the NRC issued Reg Guide 8.8 and 8.10 and Vermont Yankee had only to make minor modifications to a few procedures to meet the intent of these guides.

With the modifications made since your 1980 inspection, we believe our present ALARA program is adequate. We will, of course, make any improvements that staff experience or plant operation dictates.

Diane M. McCue
Diane M. McCue Notary Public
My Commission Expires February 10, 1992