



SAVANNAH NUCLEAR EXPERIMENTAL CORPORATION
GENERAL PUBLIC UTILITIES SYSTEM

JERSEY CENTRAL POWER & LIGHT COMPANY
NEW JERSEY POWER & LIGHT COMPANY
PENNSYLVANIA ELECTRIC COMPANY
METROPOLITAN EDISON COMPANY

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May 11, 1964

Mr. Edison G. Case, Acting Director
Division of Reactor Licensing
U.S. Atomic Energy Commission
Washington 25, D. C.

Dear Mr. Case:

Paragraph 20.203 (c)(2) of Atomic Energy Commission Regulation 10 CFR 20, Standards for Protection against Radiation, requires that entry into a high radiation area as defined in the regulation shall be indicated by a visible or audible alarm signal. By letter on 8 February 1963 Saxton requested an exemption from this requirement for the containment vessel and a section of tunnel during reactor operation.

Since that time two additional areas within the restricted area have become high radiation areas. These areas are the radioactive waste handling area and the radioactive waste filled drum storage area.

The radioactive waste handling area has locked doors. The filled drum storage area is a rectangular earthen dike with railroad tie cribbing on the inner sides for support and to provide vertical walls. The top of the dike is eight (8) feet above grade level. A gate has been installed at the one ground level entrance to the storage area. A forty (40) inch high five strand barbed wire fence is being installed around the top of the dike to stop entry to the area by way of the top. Keys to high radiation areas will be maintained in the physical custody of either the Reactor Plant Supervisor on duty or a senior plant supervisor.

We believe that proper posting and restricting access to these high radiation areas will comply with the intent of paragraph 20.203 (c)(2). Strict compliance with the wording of paragraph 20.203 (c)(2) would require the installation of conduit, wiring, switches, alarms or other signals resulting in considerable expense which does not seem justified in order to comply with the intent of this paragraph and is not as positive a control as locking the door or gate.

In accordance with paragraph 20.501 of Regulation 10 CFR 20, exemption from that part of paragraph 20.203 (c)(2) requiring a visible or audible signal is requested for the high radiation areas described in this letter on the basis that the areas will be posted, kept locked, and that administrative control as described above will be followed. In our opinion the granting of this exemption will not result in an undue hazard to life or property and will ensure more safety than that which would be provided by following only the letter of 10 CFR 20.

Very truly yours,

W. H. Layman
General Manager

WHL:rt

cc: G. F. Trowbridge, Require

Copies not on original:

D. C. Beatty
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