



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

ROGER W. KOBER  
VICE PRESIDENT  
ELECTRIC & STEAM PRODUCTION

TELEPHONE  
AREA CODE 716 546-2700

May 24, 1984

Mr. W. Pasciak, Chief  
Effluents Radiation Protection Section  
Radiation Protection Branch  
U.S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Subject: I & E Inspection Report No. 84-02  
Notice of Violations  
R. E. Ginna Nuclear Power Plant, Unit No. 1  
Docket No. 50-244

Dear Mr. Pasciak:

In accordance with the above subject, which stated:

"As a result of the inspection conducted March 6-9, 1984, and in accordance with the revised NRC Enforcement Policy (10CFR2, Appendix C), published in the Federal Register Notice (49FR8583) dated March 8, 1984, the following violations were identified:

- A. 10CFR20.103(a)(3), "Exposure of individuals to concentrations of radioactive materials in air in restricted areas, requires the licensee, for the purpose of determining compliance with the requirements of this section, to use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas".

Contrary to the above, on March 6, 1984, the licensee did not use a suitable measurement of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in the Sorting Area of the Upper Radwaste Storage Building because the air sample taken was not representative of the breathing zone of the worker.

Special Worker Permit (SWP) No. S40549 required that a Label air sample be taken, and the air sample taken

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was from an area 20-25 feet away from where the work was being performed."

- B. Technical Specification 6.8, "Procedures" requires procedures be established, implemented, and maintained covering the activities referenced in Appendix "A" of Regulatory Guide 1.33, November, 1972. Item G.2 of Appendix "A" requires procedures be established for the Solid Waste System.

Section 6.8.2 of Technical Specification 6.8 states that "each procedure..., and changes thereto, shall be reviewed by the PORC and approved by the Station Superintendent prior to implementation..."

Contrary to the above, a contractor process control program procedure, associated with the licensee's solid waste system, has been implemented for approximately two years, and the procedure has not been reviewed by PORC, and neither has it been approved by the Station Superintendent.

- C. Item 2.2 of Section 10 of the licensee's Quality Assurance Manual, developed pursuant to Criterion X of Appendix B to 10CFR50 states, "Establish an inspection personnel qualification program and qualify station...personnel as appropriate".

Procedure No. A-1002, Revision No. 5, "Qualification of Inspection Personnel", developed pursuant to the above, states in Item 1.0, "Purpose", "To establish the requirements for the qualification of Ginna Station and Electric Meter and Laboratory personnel who perform verification inspection activities".

Contrary to the above, the licensee has not established a personnel qualification program for inspection personnel who perform verification inspection activities having to do with transport package.

- D. Technical Specification 6.8, "Procedures", requires written procedures be established, implemented and maintained.

1. Procedure No. HP-4.3, "Work Permit Use", developed pursuant to the above, states in Item 6.2.2 that, "Each SWP shall be approved by the supervisor or foreman of group involved..."

Contrary to the above, Special Work Permit (SWP), No. S40549, dated March 6, 1984, issued for the trash sorting job being performed in the Upper Radwaste Storage Building, was not approved by the supervisor or foreman of the group involved.

It was approved by a junior health physics technician.

2. Procedure No. ST-81.1, "Drumming of Waste Evaporator Bottoms and Miscellaneous Waste", developed pursuant to the above, states in Item 4.8 that "All speciality waste must have a lab test for solidification prior to the actual solidification of the waste.

Contrary to the above, acid rinse waste from the Waste Evaporator Feed Tank, identified as speciality waste contained in Drums No. 4014, 4020 and 4021, were not subjected to a lab test for solidification prior to the actual solidification of the waste.

the following is being submitted in response to the above stated items.

Item A

Investigation of this incident indicated a misunderstanding by the junior contract technician who had placed the air sampler at the location where the individual was performing some of the work. The junior tech had performed this work during a previous outage and he assumed that all the work was performed on the work table where he had placed the sampler.

Discussions within the Health Physics section including contractors indicates that there is lack of procedural guidance in the overall use of the different types of air samplers.

To preclude recurrence, a procedure will be developed which describes the various air samplers and their specific uses as expected by the health physics section. This will give the training section a basis for better training of incoming contract and house technicians as well as provide a readily available reference in one overall procedure. Current procedural guidance is spread throughout several different procedures.

Item B

The drumming procedure ST-81.1 references a NUMANCO procedure which included a solidification test. Since a solidification test should provide documentation to back up the solidification process we agree that this should be a PORC approved document.

Although these tests were performed many times while setting up the current solidification matrix, we have not solidified unusual materials nor frequently changed the chemistry of materials.

The NUMANCO procedure is just an outline and needs to be improved so better guidelines are given for the test. We are currently in the process of writing this procedure and it will be included in our RD series procedures.

The use of references in our plant procedures is still considered a viable alternative to inclusion in the procedure itself. ANSI standards, ASTM, APHA and many industry accepted procedures are referenced and used by our section without including them entirely in the parent PORC approved procedure.

#### Item C

We agree with the finding as stated.

Personnel assigned to the verification inspection activities, of transport packages, have performed this task for a minimum of three years. These inspections are accomplished in accordance with plant approved RD and QCIP procedures. Prior to resin shipment, all personnel performing work and inspection receive documented training. The assigned inspectors are Level II mechanical and have received undocumented training in transport package inspection by QC supervision. All QC personnel receive annual six hour training in the R.E. Ginna Health Physics orientation program.

To preclude recurrence, a consultant firm has been employed to provide four half days of classroom instruction for QC Inspectors, HP Technicians and involved craft personnel. A written test, prepared by QC Supervision, will be given to QC Inspectors as well as on-the-job training as future shipments are made. Compliance will be achieved by July 15, 1984.

#### Item D

1. The procedure, as currently written, does not delineate very clearly who should be signing work permits. In this particular incident, the permit had been written for many days for the job being performed. The junior tech had been involved throughout this period and felt he was "supervising" the individuals performing the work.

HP-4.3 will be changed to further delineate who may sign a permit as job supervisor.

2. We disagree with this finding as stated.

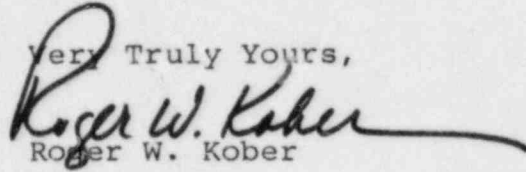
The term speciality waste refers to waste which does not meet the matrix requirements of ST-81.1. In this case as part of a normal plant procedure, the waste evaporator was acid cleaned and the bottoms were drummed utilizing ST-81.1 correctly. The pH of the bottoms



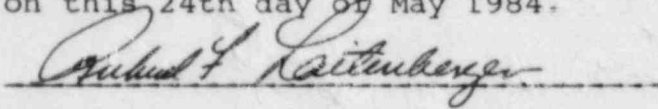
had been adjusted to meet the normal drumming matrix requirements and was therefore not "speciality waste".

The individual who performed the drumming cycle realized that ST-81.1 requirements were met but for his own information had marked the drum as "waste evaporator acid flush" waste.

Very Truly Yours,

  
Roger W. Kober

Subscribed and sworn to me  
on this 24th day of May 1984.

  
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RICHARD F. LAITENBERGER  
Notary Public State of New York  
Monroe County, N.Y.  
Commission Expires March 3 1985  
Reg. No. 2235125