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August 16, 1979
GQL 1071

Mr. B. H. Grier, Director
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Sir:

Three Mile Island Nuclear Station, Units 1 and 2
Operating License Nos. DPR-50 and DPR-73
Docket No. 50-289 and 50-320
Radiation Protection Program

Met-Ed has continued its effort to meet the commitments of our 7/18/79 letter (GQL 0909) as modified by our 8/6/79 letter (GQL 1018) and our 8/13/79 letter. The specific status of each item identified in our 8/13/79 letter which requires further action is presented below. For clarity and continuity, the paragraph numbers used below correspond to those used in our 8/13/79 letter.

2. A review of the QA program as it relates to providing for regular audits of the Radiation Protection Program by individuals who are independent of the day-to-day radiological protection activities has been completed. Documentation of the review and the resulting recommendations will be provided to on-site members of your staff on 8/16/79.

5. a. Health Physics Procedure "Internal Dosimetry/Bioassay Program" (HP 1628) describes the subject program and has been revised to incorporate the guidance provided in ANSI N-347, Reg. Guide 8.15 and NuReg 0041.

A procedure (HP 1628.1) for implementing the Internal Dosimetry/Bioassay Program described in HP 1628 has been prepared which contains action levels for whole body counting and urinalysis for suspected acute and chronic exposures of Sr-89 and Sr-90.

Procedures HP 1628 and 1628.1 have been approved and submitted to the NRC I&E representatives on site for review and comment.

- b. Health Physics Procedure "Respiratory Protection Program" (HP 1616) has been expanded in the form of an implementing procedure (HP 1616.4) which includes a detailed air sample analysis sequence with action levels specified when airborne concentrations of Sr-89 and Sr-90 (based on Cs levels) are measured. Procedure HP 1616.4 has been approved and submitted to the NRC I&E representatives on site for review and comment.

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- c. The calculation of MPC hours for airborne concentrations of radioactivity has been included in Health Physics Procedure "RWP Procedure" (HP 1613) and in an implementing procedure "MPC Hours" (HP 1616.5).

Procedures (HP 1613 and HP 1616.5) include the requirement for a periodic review of air sample results. Both of these procedures have been approved and submitted to NRC I&E representatives on site for review and comment.

- d. A procedure specifying the care, use, and cleaning of the respiratory protection devices (HP 1616.3), is presently undergoing review by the Plant Operations Review Committee (PORC). This procedure will be approved and submitted to the NRC I&E on site representatives by August 24, 1979.

The Tritium air sampling procedure (HP 1608), and the procedure for overall respiratory program implementation HP 1616.4, have been approved and submitted to the NRC I&E on site representatives for review and comment.

- e. Health Physics Procedure "Air Test Booth" (HP 1717) has been revised and submitted to the NRC I&E on site representative for review and comment.
- f. A training program for HP foremen and technicians has been developed for the comprehensive bioassay program. Initial training has been completed and the program was implemented on 8/17/79. Ongoing training and program review is continuing.
6. A procedure providing for ALARA review and evaluation of potential exposures of individuals to concentrations of airborne radioactive materials, as required by 10 CFR 20.201(b), will be reviewed and approved by August 24, 1979. A draft of this procedure has been prepared and is currently undergoing review.

Sincerely,

/s/ J. G. Herbein

J. G. Herbein
Vice President-Generation

JGH:djh

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