

James A. FitzPatrick  
Nuclear Power Plant  
P.O. Box 41  
Lycoming, New York 13093  
315 342 3840

Harold A. Glovier  
Resident Manager



**New York Power  
Authority**

July 23, 1985  
JAFP-85-0617

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King Of Prussia, PA 19406

Attention: Thomas T. Martin, Director  
Division of Radiation Safety and Safeguards

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333  
INSPECTION NO. 85-12

Gentlemen:

In accordance with the provisions of 10 CFR 2 Appendix C, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated June 21, 1985, as received by the undersigned on June 28, 1985. This refers to the inspection conducted by Mr. R. L. Nimitz of your office on April 22 through 26, 1985, at the James A. FitzPatrick Nuclear Power Plant.

RESPONSE TO NOTICE OF VIOLATION

A. The Power Authority agrees with this finding:

The fundamental cause of this violation was that plant workers did not thoroughly read RWP requirements and leadmen did not ensure that their work crews comply with each and every aspect.

Immediate Corrective Action:

On April 25, 1985 a memo was distributed to plant workers reminding them of their responsibility for complying with RWP requirements and Radiation Protection Procedures in general. This memo (JSOP-85-037) also reminded RES supervisory and technical personnel of their responsibility for verifying worker RWP compliance. The ALARA Supervisor was counseled on the importance of obtaining ALARA review signatures in a timely manner. It should be noted that this is an isolated incident in that 71 ALARA reviews have been completed or are in progress and only one was found lacking a required review signature.

Permanent Corrective Action:

Work practice guides are being developed to provide RES technical personnel with formal guidance when monitoring more radiologically significant work activities. Among work practice guides under development is one which controls work on the refuel floor (equipment storage pit, reactor cavity and spent fuel pool). This guide will

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address removal of equipment from the pools and will be completed prior to the next refueling outage.

B. The Power Authority agrees with this finding:

The fundamental cause of this violation was an inadvertent omission in the RES department procedures specifying instructions for issue of MR keys.

Immediate Corrective Action:

On April 25, 1985 a memo (JSOP-85-038) was forwarded to the Security/Safety and Fire Protection Superintendent requesting that MR keys not be issued to anyone without a Key Request form signed by the Superintendent of Power and the Radiological and Environmental Services Superintendent. On April 23, 1985 the key logbook located in the Shift Supervisor's office was audited and the missing key recovered. In addition, the Operations Department Standing Order Number 19 (ODSO-19) was revised to require logging of a person's security badge number when given a key. This was done to facilitate key recovery. A copy of ODSO-19 was placed in the key control logbook. Revised operations procedures are listed in the department night orders for review by Operations Department personnel.

Permanent Corrective Action:

Compliance on an interim basis was achieved as indicated in the Immediate Corrective Action above. However, a detailed procedure for control and issue of MR keys will be included in the Radiation Protection Manual which is currently under development.

*by dir R. G. Glover*

HAROLD A. GLOVIER

HAG:EAM:mjb

Copy: J. P. Bayne/WPO, J. C. Brons/WPO, R. A. Burns/WPO,  
J. J. Kelly/WPO, G. M. Wilverding/WPO, J. A. Gray,  
Jr./WPO, A. Klausmann/WPO, R. J. Converse/JAF, R.L.  
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