



Portland General Electric Company

Bart D. Withers Vice President

RECEIVED  
HRC

1985 JUL 17 AM 11:13

REGION VISE

July 15, 1985

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission  
Creekside Oaks Office Park  
1450 Maria Lane, Suite 210  
Walnut Creek CA 94596-5368

Dear Mr. Martin:

Response to Notice of Violation

This letter is in response to the Notice of Violation forwarded by your letter dated June 13, 1985. The Notice addressed the failure to evaluate extremity radiation exposure due to nonpenetrating radiation following the steam generator insert handling occurrence of August 16, 1984.

During the transfer, 8 steam generator inserts were moved from inside the Containment bioshield to a shielded cask in the Fuel Building. Due to possible inadequate monitoring, an exposure investigation was conducted to assign extremity and airborne radiation exposures.

The steam generator insert transfer exposure investigation included a time motion study of 7 individuals over a one-hour period to determine radiation doses to the individuals' extremities and the airborne radioactivity levels to which the individuals were exposed.

Failure to explicitly include nonpenetrating radiation in the initial exposure investigation resulted from the manner in which the extremity exposures were determined. Ratios of contact to whole body radiation measurements were used in the evaluation to determine extremity radiation doses. These radiation measurements should include both penetrating and nonpenetrating radiation, therefore, accounting for nonpenetrating radiation in the exposure investigation.

8508130234 850715  
PDR ADDCK 05000344  
Q PDR

Portland General Electric Company

Mr. John B. Martin

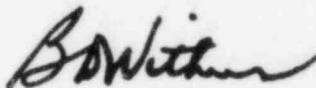
July 15, 1985

Page 2

When questioned by your NRC inspector, it was determined that there was no documented proof that these readings included nonpenetrating radiation. Therefore, as noted in the NRC report, a further evaluation was completed which explicitly includes a radiation dose attributable to nonpenetrating radiation.

Although the subject evaluation was deficient in not explicitly addressing the nonpenetrating radiation exposure, PGE considers the manner in which exposure investigations are conducted to be adequate. The omission addressed in the Notice of Violation was not due to programmatic or training deficiencies. However, it is recognized that the persons performing the evaluation and those reviewing the evaluation should have identified this potential weakness in the evaluation. Therefore, the results of this evaluation will be reviewed with the Radiological Safety Branch and Trojan Radiation Protection personnel, who may perform exposure investigations in the future. This action will be completed by August 15.

Sincerely,



Bart D. Withers  
Vice President  
Nuclear

Attachment

c: Mr. Lynn Frank, Director  
State of Oregon  
Department of Energy