



**GPU Nuclear**  
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Writer's Direct Dial Number

October 14, 1985  
85-301

Dr. T. E. Murley  
Region I  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Dr. Murley:

Subject: Oyster Creek Nuclear Generating Station, Operating  
Licensing No. DPR-16, Docket No. 50-219  
Three Mile Island - Nuclear Station Unit 1, Operating  
License No. DPR-50, Docket No. 50-289  
Three Mile Island - Nuclear Station Unit 2,  
Docket No. 50-320  
Surveys for High Radiation Area Status

This letter is to inform you of a practice adopted by GPU Nuclear at Oyster Creek, Three Mile Island Unit 1, and Three Mile Island Unit 2 Nuclear Stations, concerning radiation measurements for determining the status of high radiation areas. Our past practice was to categorize high radiation areas on the basis of contact radiation measurements. Our new practice will be to control only those areas in which it is determined an individual's whole body dose is likely to exceed 100 millirem in one hour.

The following criteria will be used to determine high radiation area status:

1. If the radiation measurement at one foot (approximately 30 centimeters) from any source of radiation, considering source size, geometry and intensity, will permit an individual to exceed the requirements of 10 CFR 20.202(b)(3), the area shall be controlled as a high radiation area or locked high radiation area in accordance with the applicable site Technical Specifications.
2. Those areas not posted in accordance with Paragraph (1) above will be posted with "hot spot" markers if there are radiation measurements greater than 100 mR/hr at contact with any radiation source.

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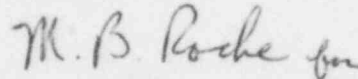
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3. Those normally inaccessible areas, such as overheads, which may have radiation measurements resulting in the need for control as high radiation areas, will be posted with cautionary signs at appropriate access points. These signs will require notification of the Radiological Control Department prior to working in such areas. If these areas become accessible due to maintenance or modification work, then they will be managed in accordance with Paragraph (1).

This new GPU Nuclear practice is consistent with the existing NRC regulations, and is also consistent with the proposed revision to 10 CFR Part 20. It will not result in our employees receiving additional dose. It will, however, allow us to reclassify several areas and remove costly administrative controls on areas not warranting such attention. There will be no sacrifice of radiological safety.

The implementation of the above practice by written procedure is currently underway. If there are any regulatory concerns with our implementation of this practice, please contact Mr. J. R. Thorpe, Director of Licensing and Regulatory Affairs, at (201) 299-2272 immediately.

Very truly yours,



R. W. Heward, Jr.  
Vice President and Director  
Radiological and Environmental  
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RWH/brh/mjh  
0502U/001

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