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C301-97-2011
June 16, 1997

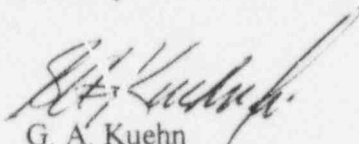
U. S. Nuclear Regulatory Commission
Attn: Mr. Thomas Dragoun
Project Scientist, Region I
475 Allendale Dr.
King of Prussia, PA 19406-1415

Mr. Dragoun,

Subject: Saxton Nuclear Experimental Corporation Facility
Operating License No. DPR-4
Docket No. 50-146
SNEC Facility Inspection Report 97-01

The purpose of this letter is to clarify statements in safety inspection report 97-01 for the Saxton Nuclear Experimental Corporation facility which do not reflect GPU Nuclear's practices or intentions. This action is being taken to assure that there is no misunderstanding between the Commission staff and GPU Nuclear with regard to the specific items and to correct the record.

Sincerely,


G. A. Kuehn
Vice President SNEC

WGH
Attachment
cc:

NRC Project Manager NRR - Alexander Adams
NRC Document Control Desk



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Item 1

O3.b. Operations Procedures and Documentation Observations and Findings

The policy requires, in part, two levels of review by certified individuals, the Independent Safety Reviewer, and the Responsible Technical Reviewer (RTR) prior to issuance of a procedure.

Clarification

Two levels of review are not always required. The number of reviews associated with a particular procedure are determined by the responses to the safety determination screening questions as provided by the procedure initiator. If the activity involved 1) does not have the potential to adversely affect safety during decommissioning activities, 2) will not require a change to the system/component description or the procedural/operating description in either the Updated Safety Analysis Report (USAR) or the Technical Specifications (TS), or 3) will not involve a test or experiment not described in the USAR or TS, only the first review by the Responsible Technical Reviewer is required.

Item 2

O6.b. Operations Organization and Administration Observations and Findings

Management assigned responsibility to SNEC Quality Assurance to maintain a list of commitments and to conduct audits to verify implementation.

Clarification

Responsibility to maintain the commitment listing has been assigned to the Decontamination and Decommissioning Engineering (D&DE) department. Individuals from the GPU Nuclear Inc. Nuclear Safety Assessment department are assigned to perform monitorings and audits of activities which are in the scope of the SNEC Facility Quality Assurance Plan. There is no group within GPU Nuclear Inc. designated "SNEC Quality Assurance".

Item 3

R1.1 b Radiological Protection and Chemistry Controls: Control of Transuranic Isotopes, Observations and Findings

- 3a) Work areas will be color coded to reflect the level of alpha and beta/gamma contamination and degree of controls required to minimize internal exposures.

Clarification

The level of alpha and beta/gamma contamination and degree of controls required to minimize internal exposures will be identified by color coding system equipment and components not by color coding the work area in which it is located.

- 3b) The zone designations will be based on NRC Regulatory Guide 1.86 criteria.

Clarification

NRC Regulatory Guide 1.86 criteria will not be the singular basis for zone designations. Regulatory Guide 1.86 criteria and appropriate values listed in 10 CFR 20 Appendix B will be used as guidance for designating zones.

Item 4

R1.2 b. Effluent and Environmental Monitoring, Observations and Findings

- 4a) There are 27 environmental TLDs distributed in concentric rings around the site, biased in downwind directions based on historic wind rose data.

Clarification

The environmental TLDs are distributed at the site boundary and several off site locations. The concept of the concentric rings is inaccurate in that the site boundary is not equidistant from the Containment Vessel.

- 4b) The alarm setpoint will be based on a 7 millirem TEDE population dose per quarter (15 millirem per year) calculated assuming a dispersion factor of $1E-5$ for a ground level release under adverse atmospheric conditions.

Clarification

SNEC facility gaseous effluent combined releases are controlled per the Offsite Dose Calculation Manual (ODCM) by effluent sampling and radiation monitor set points. These measures assure that releases do not combine to produce dose at the site boundary which would exceed 1500 mrem per year to an organ. The ventilation radiation monitor set point will be based on a fraction of the limit. The effluent radiation monitor set point calculation is described in the ODCM.

- 5) The licensee stated that the effluent control and environmental monitoring programs will be submitted to the NRC for approval as a Radiological Environmental Technical Specification.

Clarification GPU Nuclear submitted the Environmental Report on April 17, 1996 which contains as Section 7.5 the Environmental Radiological Surveillance Program currently in effect at the SNEC facility. It is the "environmental monitoring program". In its response to the NRC's request for additional information regarding the submittal of the SNEC Facility Decommissioning Plan and Environmental Report dated July 18, 1996, GPU Nuclear committed to submittal of the Offsite Dose Calculation Manual (ODCM) when it was issued. It contains the "effluent control program". It was submitted to the NRC on June 5, 1997.

The submittal of these documents should not be construed as satisfying a requirement for a Radiological Environmental Technical Specification. The SNEC facility was operated and shutdown prior to the institution and elimination of Radiological Environmental Technical Specifications from operating plant technical specifications.