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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1990 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

January 16, 1981

Docket No. 50-312

Sacramento Municipal Utility District
P. O. Box 15830
Sacramento, California 95813

Attention: Mr. John J. Mattimoe
Assistant General Manager and Chief Engineer

Gentlemen:

Subject: Health Physics Appraisal

The NRC has identified a need for licensees to strengthen the health physics programs at nuclear power plants and has undertaken a significant effort to assure that action is taken in this regard. As a first step in this effort, the Office of Inspection and Enforcement is conducting special team appraisals of the health physics programs, including the health physics aspects of radioactive waste management and onsite emergency preparedness, at all operating power reactor sites. The objectives of these appraisals are to evaluate the overall adequacy and effectiveness of the total health physics program at each site and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements but also for effecting improvements in NRC requirements and guidance. This effort was identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement.

During the period of September 22 - October 3, 1980, the NRC conducted the special appraisal of the health physics program at the Rancho Seco Nuclear Generating Station. Areas examined during this appraisal are described in the enclosed report (50-312/80-32). Within these areas, the appraisal team reviewed selected procedures and representative records, observed work practices, and interviewed personnel. It is requested that you carefully review the findings of this report for consideration in effecting improvements to your health physics program. The findings of the appraisal at Rancho Seco indicate that although your overall health physics program is adequate for present operations, several significant weaknesses exist. These include the following:



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- (1) insufficient radiation protection technicians and supervisors,
- (2) ineffective dosimetry records system,
- (3) inadequate controls on air supplied for respiratory protective use,
- (4) ineffective radiation protection records system,
- (5) inadequate measures to limit personnel exposures during instrument calibrations,
- (6) failure to implement a formal ALARA program,
- (7) inadequate measures to limit and evaluate extremity exposures during sampling activities,
- (8) failure to provide air flows meeting industry standards in certain engineered systems designed to protect personnel, and,
- (9) deficiencies in procedure format.

These findings are discussed in more detail in Appendix A, "Significant Appraisal Findings." We recognize that an explicit regulatory requirement pertaining to each significant weakness identified in Appendix A may not currently exist. However, to determine whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty five (25) days of your receipt of this letter, describing your corrective action for each significant weakness identified in Appendix A including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

During this appraisal, no items of noncompliance were identified.

You should be aware that the next step in the NRC effort to strengthen health physics programs at nuclear power plants will be the imposition of a requirement by the Office of Nuclear Reactor Regulation (NRR) that each licensee develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for significant weaknesses identified during the special appraisal of the current health physics program. Guidance for the development of this plan will incorporate pertinent findings from the special appraisals and will be issued for public comment in the near future.

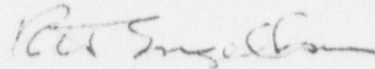
In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC's Public Document Room. If this material contains any information that you believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as

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listed in Subparagraph (b)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, this letter and the enclosure will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



R. H. Engelken
Director

Enclosures:

1. Appendix A, Significant Appraisal Findings
2. Office of Inspection and Enforcement
Inspection Report No. 50-312/80-32

cc w/o enclosure 2:

R. J. Rodriguez, SMUD

L. G. Schwieger, SMUD

APPENDIX A

Sacramento Municipal Utility District
P. O. Box 15830
Sacramento, California 95813

Docket No. 50-312

License No. DPR-54

Significant Appraisal Findings

Based on the Health Physics Appraisal conducted September 22 - October 3, 1980, the following items appear to require corrective actions. (Section references are to the details portion of the enclosed Inspection Report).

1. Radiation Protection Organization and Management Oversight

The present level of staffing and the organization of the Chemistry-Radiation groups are not adequate to provide the necessary support of routine operations at the technician and first and second line supervisory levels. Further the loss of the Health Physicist represents a significant reduction in the level of professional staffing of the Chemistry-Radiation group which requires prompt correction. (Section 2.1.3, Staffing)

2. Exposure Controls

External

- (a) The existing dosimetry records system failed to provide the accessibility, flexibility and currentness necessary to permit the level of management control of exposures required. In addition, a need exists to improve the reproducibility and reliability of reading pocket ionization chambers and recording the results. (Section 4.1.1)

Respiratory Protection

- (b) The existing controls on air quality for the use of supplied air respiratory protective systems failed to properly evaluate the quality of the intake and supplied air used. Further, a clear delegation of responsibility and authority for the respiratory protection program should be provided and supported by management. (Section 4.2.2)

Surveillance

- (c) The existing mechanisms for controlling the generation, recording, retention and retrievability of radiation protection records

fails to provide the benefits which such a system should make available in the areas of job planning, trend identification and evaluation and ALARA support. (Section 4.3.2)

Instrumentation

- (d) The portable instrument calibration facility and its use failed to minimize the possible exposure of personnel during calibration activities. (Section 4.3.4 Portable Instruments)

3 ALARA Program

The ALARA Program needs upper level management guidance and support in the areas of assignment of responsibility, resources and the establishment of implementing procedures, instructions, documentation and an effective measurement system. Improved preplanning to minimize exposures needs the support of an effective, accessible exposure data records system. Upper level management's commitment to ALARA needs to be clearly identified and communicated to all Rancho Seco personnel. (Section 6.0)

4. Facilities and Equipment

- (a) Sampling techniques fail to identify extremity exposure hazards or to monitor for extremity dose. (Section 7.2)
- (b) Engineered systems designed to protect individuals from possible exposures to airborne radioactive materials failed to provide the air flows necessary to meet industry standards and possibly to protect individuals from unnecessary exposure. (Section 7.6)

5. General Procedure Development

Procedures failed to clearly identify the approval status and currentness to the user as recommended by ANSI N18.7. (Section 9.0)