



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NOV 29 1979

DOCKET NUMBER 50-320

Mr. Richard Heward, Manager  
Radiological Controls  
P.O. Box 480  
Middletown, PA 17057

Dear Mr. Heward:

Subject: Radiation Protection Plan, Submittal 11/21/79

We have reviewed the subject document and attached our substantive comments, which we believe need to be considered before you submit your final plan to us. We acknowledge that the incorporation of these comments may cause a delay in providing us this final plan by the agreed upon date of November 30, 1979. In view of this, we will provide you an extension to December 5, 1979.

Sincerely,

A handwritten signature in cursive script that reads "John T. Collins".

John T. Collins  
Deputy Director  
TMI Support

Enclosure: As stated

cc w/encl:

J. G. Herbein, Vice President Nuclear Operations  
E. G. Wallace, Manager Licensing  
G. P. Miller, Manager Support Services and Logistics  
J. B. Logan, Superintendent Unit 2  
G. A. Kunder, Unit 2 Superintendent - Technical Support  
J. J. Colitz, Manager Plant Engineering  
R. F. Wilson, Director TMI-2 Recovery, Acting  
I. R. Finfrock, Jr.  
R. W. Conrad  
G. F. Trowbridge, Esquire  
J. B. Lieberman, Esquire  
Ms. Mary V. Southard, Chairperson, Citizens for a Safe Environment

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Mr. Richard Heward

2

NOV 29 1979

R. Vollmer  
D. Neely  
G. Smith  
T. Murphy  
J. White

November 28, 1979

MEMORANDUM FOR: J. T. Collins, Deputy Director, TMI Support  
FROM: J. R. White, Senior Radiation Specialist  
SUBJECT: RADIATION PROTECTION PLAN, SUBMITTAL 11/21/79

The November 21, 1979 submittal is much improved over the previous effort. The following is my assessment and comments on this latest submittal:

a. Chapter 1 - Introduction.

The only objective of the RPP is the implied goal to keep exposures to both station and off-site personnel as low as reasonably achievable. While this is a worthwhile endeavor there is no tangible evidence, description or definition of the licensee's ALARA program, i.e., there is no criteria, guidelines, procedures, specifications, etc., that define the station's ALARA program. Chapter 5.1 ALARA Program does not describe any existing program but rather indicates that a program will be implemented in the future based on something called "the ALARA philosophy," which is also undefined.

Recommendations - Specify the following objectives and the radiation protection systems required to achieve them:

1. Control Hazards to Avoid Acute Radiation Accidents;
2. Maintain Exposures within the Regulatory Requirements; and,
3. Maintain Exposures as low as Reasonably Achievable.

The type of processes that may have to be addressed to meet such objectives are: Job Safety Analysis, Independent Review System, Procedure Development and Implementation System, Personnel Selection, Training, and Qualification, Worksite Control System, Hardware Evaluation and Analysis, Human Factors Consideration Process, etc.

b. Chapter 2 - Radiological Controls Department.

Comments - It should be assured that the organization and personnel qualification cited here are in agreement with the proposed Technical Specifications.

c. Chapter 3 - Standards for Radiation Exposure Control.

Comment - Section 3.4 indicates that ALARA administrative guidelines will be developed. Same comment as Item a.

8001150 218

- d. Chapter 5 - Radiation Exposure Control. Same comment as Item a.

Section 5.2.1 "Restricted Areas" - It should be assured that such a procedure is specified in the RCPM. Currently we are only aware of AP 1050, "Control of High Radiation Areas."

Section 5.3, "Respiratory Protection Program" appears to be a policy statement but it is not in accord with Regulatory Guide 8.15. At this time there is no policy statement addressing Respiratory Protection as is required by 10 CFR 20.103. It is recommended that such a policy statement be incorporated into the RPP.

- e. Chapter 6 - Radiation Exposure Monitoring Program.

Section 6.1, "Policy" indicated that the RCPM addresses personnel responsibility in regards to wearing dosimeter devices. We are unable to find such procedures as specified.

- f. Chapter 7 - Radiological Control Training.

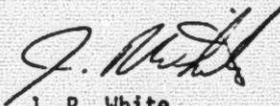
It is recommended that this section address personnel selection, training and qualification, since all of these elements are closely related and pertinent to meeting the program's goal.

- g. Chapter 8 - Radioactive Materials Program.

This chapter does not describe a program but rather specifies some procedural items that are expected to be implemented. It is recommended that the program be described here including a description of the quality assurance program as required by 10 CFR 71.

- h. Chapter 9 - Radioactive Waste Disposal.

This subject is a major activity at TMI and as such should be described more fully than a single sentence stating that the regulatory requirements will be met.



J. R. White  
Senior Radiation Specialist

cc: D. Neely  
G. Smith  
T. Murphy