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

March 5, 1981
NRC/TMI-81-018

Docket No. 50-320

Metropolitan Edison Company
Mr. Gale Hovey, Vice President
and Director of TMI-2
P.O. Box 480
Middletown, PA 17057

Dear Mr. Hovey:

Subject: TMI Unit 2 Radiation Protection Plan

We have reviewed your Radiation Protection Plan, Revision 2, dated June 16, 1980, and submitted to us by letter TLL-356 dated July 25, 1980. We conclude that minor clarification is required prior to our approval. Our comments have been discussed and resolved with your staff. These comments and their resolutions are presented below.

Articles 2, 4, 5, 6, 7, and 9 of the plan are acceptable as submitted.

Article 1

Comment: Regulatory Guides 8.2, 8.4 and 8.9 should be referenced.

Resolution: Your staff has agreed to make reference to these regulatory guides as additional regulatory guidance.

Article 3

Comment: The proposed review and audit procedures should incorporate criteria for timely and appropriate action.

Resolution: Your staff has agreed to include criteria for timely and appropriate action in implementing procedures for those functions specified in the plan.

Article 8

Comment: A means for strengthening assurance that removable contamination limits are not being exceeded should be instituted. Assurance should be given to ensure contaminated material is not released from the site above the stated limits.

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Resolution: Your staff has agreed to provide for periodic swipe surveys in implementing procedures.

Our evaluation, based on incorporation of our comments as agreed to by your staff, is enclosed. With the incorporation of the above resolutions, we conclude that your Radiation Protection Plan is acceptable.

Lake H. Barrett

Lake H. Barrett
Acting Deputy Program Director
TMI Program Office

Enclosure: As Stated

cc: See Service Distribution List

THREE MILE ISLAND, UNIT 2

EVALUATION OF RADIATION PROTECTION PLAN

RADIATION PROTECTION

Met Ed's submittal with regard to the Three Mile Island, Unit 2, "Radiation Protection Plan", describes the proposed radiation protection program.

The staff has reviewed the Radiation Protection Plan, and has used the acceptance criteria of Section 12 of NUREG-75/087, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" to judge the acceptability of the applicant's radiation protection program. Where other or additional criteria were used, those criteria are presented in our evaluation.

Article 1 Foundation for the TMI-2 Radiological Controls Program

Article 1 sets forth the Met Ed philosophies and basic policies concerning radiological controls program. We conclude that these policy considerations are consistent with the guidance of Regulatory Guide 8.8, "Information Relevant to Insuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable" and the acceptance criteria of Sections 12.1 and 12.5 of NUREG-75/087. Regulatory Guides 8.2, 8.4, and 8.9, are referenced for additional regulatory guidance. Therefore, we conclude that the policy considerations are acceptable.

Article 2 Responsibilities of Workers

Article 2 identifies specific rules to be followed by individuals working in restricted areas, in order to minimize radiological problems. We conclude that these provisions of the Plan are consistent with Regulatory Guide 8.8 and the acceptance criteria of NUREG-75/087. Therefore, we conclude that the responsibilities described in Article 2 are acceptable.

Article 3 Audits, Reviews and Reports on the TMI-2 Radiological Control Program

Article 3 identifies nine levels of audits, reviews and reports to assure that individuals and supervisors responsible for maintaining occupational radiation exposures as low as is reasonably achievable are meeting that requirement, and assisting others in understanding and complying with that requirement. Since the proposed review and audit procedures incorporate criteria for timely and appropriate action for those functions specified in the plan, we conclude that this article provides methods capable of verifying that this requirement will be met, and are therefore acceptable.

Article 4 Radiological Control Training

Article 4 describes Met-Ed's radiological control training program, to assure that each person understands radiation risks, radiological conditions to be encountered, personal responsibility to maintain exposure as low as is reasonably achievable and to comply with radiological control procedures. We conclude

that the training program described is consistent with the requirements of 10 CFR Part 19.12 and the draft guidance in the NRC draft Regulatory Guide, "Radiation Protection Training for Light-Water Cooled Nuclear Power Plant Personnel". Therefore, the training program described in Article 4 is acceptable.

Article 5 Control of External Exposure

Article 5 reaffirms Met-Ed's commitment to maintain occupational radiation exposures as low as is reasonably achievable, and describes exposure control policies and requirements addressed to that goal. We conclude that these policies and requirements are consistent with the guidance of Regulatory Guide 8.8 and the requirements of 10 CFR Part 20, "Standards for Protection Against Radiation". Therefore, the exposure control program described in Article 5 is acceptable.

Article 6 Control of Internal Exposure

Article 6 describes an internal exposure control program intended to prevent any significant internal exposure to personnel by limiting internal exposure to one tenth of the exposure to airborne radioactive materials that 10 CFR Part 20 would allow. We conclude that the internal exposure control program described is consistent with the requirements of 10 CFR Part 20.103, Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection", and Standard Review Plan, Section 12.5.

Article 7 Control of Radioactive Contamination

Article 7 states an intent to minimize possible inhalation or ingestion of radioactivity and buildup of radioactivity in the environment, in order to minimize personnel radiation exposure, to simplify subsequent decontamination, and to minimize the need to rely on anticontamination clothing, and emphasizes the importance of training in assuring success of this aspect of the program. We conclude that the licensee's plan for control of radioactive contamination is acceptable.

Article 8 Control of Radioactive Materials

Article 8 describes a program for a radiocative material control system to assure that such material is not lost or misplaced so as to cause inadvertent occupational exposures, and to prevent uncontrolled spread of such materials to areas where the public might be affected. Surveys for contamination will be provided for sampling of items to assure that contamination limits are not exceeded. We have concluded that the program for control of radioactive materials described in Article 8 is consistent with the guidance in Regulatory Guide 8.8 and the provisions of 10 CFR Part 20. Therefore, we conclude that the radioactive materials control program is acceptable.

Article 9 Organization for Radiological Controls

Article 9 describes the organization for Radiological Controls Department. We have concluded that the organization described is consistent with the guidance in Regulatory Guides 8.8 and 1.8, "Personnel Selection and Training". Therefore, the organization of the Radiological Controls Department is acceptable.

Mr. [illegible]
Metropolitan Edison Company

Mr. J. J. Barton
Manager, Site Operations, TMI-1
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. L. G. Fuller
TMI-1 Licensing Supervisor
Metropolitan Edison Company
P. O. Box 480
Middletown, PA 17057

Mr. E. G. Wallace
PWR Licensing Manager
GPU Service Corporation
100 Interpace Parkway
Parsippany, NJ 07054

Mr. J. B. Lieberman, Esquire
Berlack, Israels, Lieberman
26 Broadway
New York, NY 10004

Mr. G. F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20036

Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, TN 37830

Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

Karin W. Carter, Esquire
505 Executive House
P. O. Box 2357
Harrisburg, PA 17120

Honorable Mark Cohen
512 E-3 Main Capital Building
Harrisburg, PA 17120

Ellyn Weiss, Esquire
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Mr. Steven C. Sholly
304 S. Market Street
Mechanicsburg, PA 17055

Mr. Thomas Gerusky
Bureau of Radiation Protection
P. O. Box 2063
Harrisburg, PA 17120

Mr. Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, PA 19149

Ms. Jane Lee
R. D. 3, Box 3521
Etters, PA 17319

Walter W. Cohen, Consumer Advocate
Department of Justice
Strawberry Square, 14th Floor
Harrisburg, PA 17127

Robert L. Knupp, Esquire
Assistant Solicitor
Knupp and Andrews
P. O. Box P
407 N. Front Street
Harrisburg, PA 17108

John E. Minnich, Chairperson
Dauphin Co. Board of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, PA 17101

Robert Q. Pollard
Chesapeake Energy Alliance
609 Montpelier Street
Baltimore, MD 21218

Chauncey Kepford
Judith H. Johnsrud
Environmental Coalition on Nuclear Power
433 Orlando Avenue
State College, PA 16801

Ms. Frieda Berryhill, Chairperson
Coalition for Nuclear Power Plant
Postponement
2610 Grendon Drive
Wilmington, DE 19808

Holly S. Keck
Anti-Nuclear Group Representing York
245 W. Philadelphia Street
York, PA 17404

John Levin, Esquire
Pennsylvania Public Utilities Commission
P. O. Box 3265
Harrisburg, PA 17120

Jordan D. Cunningham, Esquire
Fox, Farr and Cunningham
2320 N. Second Street
Harrisburg, PA 17110

Ms. [illegible] McLaughlin
Three Mile Island Alert, Inc.
23 South 21st Street
Harrisburg, PA 17104

Ms. Marjorie M. Aamodt
R. D. #5
Coatesville, PA 19320

Ms. Karen Sheldon
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N.W., Suite 506
Washington, DC 20006

Earl B. Hoffman
Dauphin County Commissioner
Dauphin County Courthouse
Front and Market Streets
Harrisburg, PA 17101

Government Publications Section
State Library of Pennsylvania
Box 1601 Education Building
Harrisburg, PA 17126

Dr. Edward O. Swartz
Board of Supervisors
Londonderry Township
RFD #1 Geyers Church Road
Middletown, PA 17057

U. S. Environmental Protection Agency
Region III Office
ATTN: EIS Coordinator
Curtis Building (Sixth Floor)
6th and Walnut Streets
Philadelphia, PA 19106

Dauphin County Office Emergency
Preparedness
Court House, Room 7
Front and Market Streets
Harrisburg, PA 17101

Department of Environmental Resources
ATTN: Director, Office of
Radiological Health
P. O. Box 2063
Harrisburg, PA 17105

Governor's Office of State
Planning and Development
ATTN: Coordinator, Pennsylvania
Clearinghouse
P. O. Box 1323
Harrisburg, PA 17120

Mrs. Rhoda D. Carr
1402 Marene Drive
Harrisburg, PA 17109

Mr. Richard Roberts
The Patriot
812 Market Street
Harrisburg, PA 17105

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 220, 7735 Old Georgetown Road
Bethesda, MD 20814

Ivan W. Smith, Esquire
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section
U. S. Nuclear Regulatory Commission
Washington, DC 20555

William Lochstet
104 Davey Lab
Pennsylvania State University
University Park, Pennsylvania 16802