



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

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July 27, 1990

Mr. A. Bert Davis
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2
 Response to Inspection Report Nos.
 50-373/90013 and 50-374/90014
NRC Docket Nos. 50-373 and 50-374

Reference: (a) C.E. Norellus letter to C. Reed
 dated June 28, 1990.

Dear Mr. Davis:

This letter is in response to a meeting held with members of your Staff and representatives from Commonwealth Edison's Corporate Office and LaSalle County Station. This meeting was held at Region III offices on June 18, 1990 with the purpose to discuss the radiological conditions in radwaste tank rooms at LaSalle Station.

Reference (a) indicated that certain activities appeared to be in violation of NRC requirements.

The Commonwealth Edison response to the Level IV Notice of Violation is provided in the following attachment.

If there are any questions or comments regarding this matter, please contact this office.

Very truly yours,

T. J. Kovach
 Nuclear Licensing Manager

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Attachment

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cc: Senior Resident Inspector - LSCS

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ATTACHMENT

COMMONWEALTH EDISON RESPONSE TO NOTICE OF VIOLATION

VIOLATION: IR 373/90013-01 and 50-374/90014-01

10 CFR 20.101(b) requires each licensee make or cause to be made such surveys as (1) may be necessary to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10 CFR 20.201(a) defines a survey as an evaluation of the radiation hazards incident to the production, use, release, disposal or presence of radioactive materials or other sources of radiation under a specific set of conditions. 10 CFR 20.201(b) specifies the dose limits applicable to individuals in restricted areas.

Contrary to the above, during the week of April 22, 1990, the licensee did not conduct an adequate evaluation to determine radiological conditions associated with floor contamination before allowing worker entry onto the contaminated floor, nor were workers provided with extremity monitoring devices to measure dose to the lower extremities caused by the floor contamination.

DISCUSSION

While a radiological survey was performed to support the work during the week of April 22, 1990, it was not detailed enough to clearly demonstrate the dose gradient between near floor level and general area dose rates. Because of the high general area dose rates and the fact that the floor was recognized as being a plane source causing the elevated general area dose rates, the procedures in place at the time did not require extremity monitoring. At the time of occurrence, LaSalle County Station's LRP-1250-3, "Personnel Dosimetry Placement Guidelines" required extremity monitoring if contact dose rates were greater than 1.5 times the whole body dose rate and the whole body dose equivalent was greater than 200 mrem. Since contact dose rates in the room did not exceed the 1.5 factor, extremity monitoring was not required.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On May 4, 1990, following an evaluation of the radiological hazards in the Radwaste Tank room by the Health Physics Services Supervisor and the Radiation Protection personnel involved in controlling and monitoring the work in the area, a subsequent entry was made into the room. This entry was made with personnel wearing extremity dosimeters in addition to whole body dosimeters. The results of this entry did not indicate an exposure difference between the two locations greater than thirty percent. A survey was performed on July 18, 1990, in the tank room prior to cleaning the floor and indicated a uniform dose rate field. The dose rate measurements between the ankle, knee and chest did not vary. These actions provide assurance that no actual overexposures occurred as a result of the earlier entries.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

LRP 1250-3 has been revised to include an additional requirement for extremity monitoring. The revised procedure now requires that when contact dose rates exceed 100 mrem per hour and with the extremity submersed in the source, extremity monitoring will be required. The Radiation Protection Department was tailgated on the event where emphasis was given to the procedure revision, acceptable survey techniques and required documentation. Radiation Protection Technician continuing training will include a review of this event with emphasis given to documenting survey results.

DATE OF FULL COMPLIANCE

Radiation Protection Technician continuing training will be completed by September 28, 1990.