

DOD



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DEC 31 1996

Parameter, Inc.
Attn: Richard A. Lofy
13380 Watertown Plank road
Elm Grove, WI 53122

SUBJECT: TASK ORDER NO. 115, ENTITLED, "Kewaunee Safety System Operational Performance Inspection (SOPI)" under Contract No. NRC-03-93-026

Dear Mr. Lofy:

In accordance with Section G.4, Task Order Procedures, of the subject contract, this letter definitizes Task Order No. 115. The effort shall be performed in accordance with the enclosed Statement of Work and the Contractor's technical proposal dated December 30, 1996.

Task Order No. 115 shall be in effect from January 2, 1996 through February 14, 1997 with a cost ceiling of \$36,735.64. The amount of [REDACTED] represents the estimated reimbursable costs, the amount of [REDACTED] represents the facilities capital cost of money, and the amount of [REDACTED] represents the fixed fee.

Accounting data for Task Order No. 115 are as follows:

B&R No.:	72015111000
Job Code:	J-2407-7
BOC:	252A
RFPA No.:	NRC-03-93-026 dtd 12/16/96
APPN No.:	31X0200.720
Oblig. Amt.:	\$36,735.64

The following individual is considered to be essential to the successful performance for work hereunder: Donald C. Prevatte. The Contractor agrees that such personnel shall not be removed from the effort under the task order without compliance with Contract Clause H.4, Key Personnel.

The issuance of this task order does not amend any terms or conditions of the subject contract.

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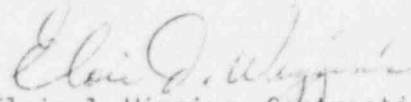
Your contacts during the course of this task order are:

Technical Matters: Armando Masciantonio
Project Officer
(301) 415-1290

Contractual Matters: John Eastman
Contract Specialist
(301) 415-6590

Acceptance of Task Order No. 115 should be made by having an official, authorized to bind your organization, execute three copies of this document in the space provided and return two copies to the Contract Specialist at the address below. You should retain the third copy for your records.

Sincerely,

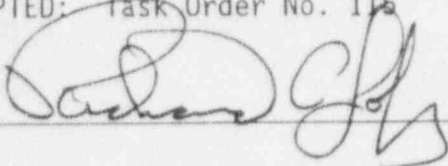


Elois J. Wiggins, Contracting Officer
Technical Acquisition Br. No. 2
Division of Contracts
Office of Administration

Enclosure: Statement of Work

ACCEPTED: Task Order No. 115

NAME



TITLE

PRES

DATE

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were closed were completed in a timely manner. Only recent entries from a September 1996 drill remained open. The inspectors were informed by the Manager, Sec/EP that, in some instances, items remained open after corrective actions had been performed to ensure that there was no recurrence.

The inspectors reviewed procedures governing self-assessment, action item tracking, and performance enhancement. These procedures provided sufficient guidance for conducting these processes and included appropriate management involvement.

The inspectors reviewed the EP group's June 1996 self-assessment report. The report was balanced in that it contained strengths and weaknesses. The report also included "watch areas" that require attention in the next year to preclude problems. The weaknesses and "watch areas" demonstrated an appropriately self-critical perspective of the EP program.

The inspectors reviewed the disposition of two 1996 action items. A thorough investigation into the circumstances surrounding these items was conducted. Assessments determined that personnel errors were the root causes and appropriate remediation training was performed. The scope of each investigation was sufficiently broad and resulted in multiple corrective actions to prevent recurrence. Overall, the responses to these two items demonstrated that management aggressively and thoroughly addressed EP problems.

c. Conclusions

PECO Energy had adequate procedures to identify, resolve, and prevent recurrence of problems and effectively utilized its AITS to trend issues. The self-assessment process was well-defined and meaningful. PECO Energy demonstrated excellent ability to investigate and resolve EP issues.

P8.2 Licensee On-Shift Dose Assessment Capabilities (Temporary Instruction 2515/134)

The inspector conducted a telephone interview with PECO Energy personnel on October 8, 1996, to gather information on the capabilities to perform on-shift dose assessments using real-time meteorological data. The interview was conducted in order to carry out NRC Temporary Instructions 2515/134, "Licensee On-Shift Dose Assessment Capabilities."

The Plan and ERPs contained documentation which demonstrated that PECO Energy was committed to performing these dose assessments, and on-shift people were trained to perform them. No discrepancies were noted.

The inspector also noted that enhanced oversight and evaluation of high radiation areas were being planned in light of the observations identified during NRC Integrated Inspection 50-352, 353/96-01. The observations during that inspection identified that, although overall radiological safety performance was good, electronic dosimetry alarm set point practices and procedures for high radiation area access controls were not always implemented in a manner that assured or promoted adequate personnel exposure control. HP personnel planned to adjust electronic dosimetry alarm setpoints, as appropriate, and enhance high radiation area controls and positive coverage.

The inspector also noted that a task team was established to reduce personnel contaminations during the upcoming outage. As of October 30, 1996, plant personnel had sustained about 300 personnel contamination reports (PCRs), 200 of which occurred during the early 1996 Unit 1 refueling outage. The inspector noted that the majority of the contaminations were unplanned shoe contaminations.

c. Conclusions

HP management implemented generally effective ALARA planning for the Unit 2 refueling outage. No safety concerns were identified.

R1.2 Applied Radiological Controls

a. Inspection Scope (83750)

The inspector toured the radiological controlled areas (RCAs) and selectively reviewed applied radiological controls including external and internal exposure controls, worker adherence to radiation work permits and good radiological controls practices, and radioactive material and contamination control practices.

b. Observations and Findings

The inspector identified overall good applied radiological controls including worker adherence to program procedures; good control and posting and/or labeling, as appropriate, of contaminated areas and contaminated or radioactive materials; good external and internal exposure controls including high radiation area controls; and good overall controls for survey and removal of material from the RCAs.

c. Conclusion

The inspector identified that overall good applied radiological controls and procedures were being implemented to control personnel exposure to radioactivity and radioactive materials.

R1.3 Control of Radioactive Sources

a. Inspection Scope (83750)

The inspector reviewed the circumstances and evaluations associated with three licensee-identified instances of inadequate control of radioactive sources. The inspector reviewed

R1 Radiological Protection and Chemistry (RP&C) Controls**R1.1 Unit 2 Refueling Outage Radiological Controls (Planning and Preparation)****a. Inspection Scope (83750)**

The inspector selectively reviewed the radiological controls planning and preparation for the Unit 2 refueling outage. The inspector reviewed records, discussed outage planning with plant personnel, reviewed various radiological controls goals including radiation exposure goals, and observed activities to verify necessary planning and preparations and management support for radiological controls planning. Areas reviewed included the increase in health physics (HP) staff; oversight of contract technicians; special training, including use of mockup training; work package review by HP personnel; dose reduction methods; radwaste reduction; and use of lessons learned from previous outages.

b. Observations and Findings

Plant personnel were providing overall effective planning and preparation for outage radiological controls work activities, including outage work scope control. A work scope freeze for the Unit 2 fourth refueling outage (scheduled to start on January 24, 1997, and end on February 15, 1997) was implemented in April 1996. Radiological controls holds were placed on all planned work except that specifically authorized by the radiological controls group. Lessons learned from previous outages (e.g., post outage review items) were reviewed and incorporated as action items for tracking and control. All planned work tasks were assigned to specific radiation work permits. Planning was also performed for potential emergent work. An area-based As Low As Reasonably Achievable (ALARA) review method was being implemented.

The general employee training program was being upgraded to increase practical factors training. Mockups were expected to be used to train personnel on the radiation work permit program and the proper use of the electronic dosimetry system.

An outage occupational exposure goal of 140 person-rem was established. The goal appeared reasonable and challenging considering work scope, previous experience, and planned ALARA controls.

Plant management planned to increase the HP staff (i.e., add an additional 54 senior radiological controls technicians) to support outage work and planned to use PECO Energy radiation protection personnel in lead capacities. The supplemental staff was to be trained and qualified in accordance with appropriate program controls.

Additional water shields and an estimated 30,000 pounds of lead were planned for installation to reduce ambient radiation fields during outage work activities. In addition, personnel were evaluating the purchase of a new type of pipe insulation with integral lead shielding.