

ATLANTA, GEORGIA

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December 1, 1978  
L-78-375

Mr. James P. O'Reilly, Director, Region II  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:DMC  
50-250/78-21  
50-251/78-21

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in cursive script, which appears to read "Robert E. Uhrig", is written over the typed name.

Robert E. Uhrig  
Vice President

REU/MAS/cpc

Attachment

cc: Robert Lowenstein, Esquire

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OFFICIAL COPY



ATTACHMENT

Re: RII:DMC  
50-250/78-21  
50-251/78-21

Finding A

Technical Specification 6.11 states, in part, that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be adhered to for all operations involving personnel radiation exposure. Procedure HP-66, "Issuance and Control of Respiratory Protection Equipment," requires, in part, that prior to personnel being issued respiratory equipment, the Health Physics Shift Supervisor, or his designee, ensure that the personnel have been properly trained and found to be medically certified to wear a respirator.

Contrary to the above, the inspectors observed the following instances where the requirements of approved radiation protection procedures were not being adhered to:

1. On September 11, 1978, respirators F-98 and F-138 were issued to an individual who was not medically certified to wear a respirator.
2. On August 31, 1978, respirators F-111, F-285, F-153, F-42, F-25, F-164, and F-05 were issued to a corporation name rather than a trained, medically certified individual. Numerous examples of corporate issuance were noted by the inspector for the month of August, 1978.

Response A

The immediate corrective action was to determine if the individuals who used the cited respirators were in fact qualified to use them. It was found that, although the respirators may have been issued improperly, they were in all cases used by trained and medically certified individuals.

In order to help prevent recurrence, respiratory protection equipment training classes were held for appropriate health physics personnel on October 4 and 5, 1978. The classes stressed the importance of adhering to the policy of issuing respirators only to individuals who are trained and medically qualified to use them. Compliance was achieved as of October 5, 1978.

To provide further assurance of preventing recurrence, Operating Procedure 11550.66 (Issuance and Control of Respiratory Protection Equipment) will be revised to clearly prohibit issuance of respirators to corporation names. Furthermore, the effectiveness of corrective action regarding the issuance of respirators will be audited during the first half of 1979.



### Finding B

10 CFR 71.12b(ii) requires, in part, that the persons using shipping containers, pursuant to the general license, for which a certificate of compliance has been issued, comply with the terms and conditions of the certificate. Certificate of Compliance No. 9113 for the Model No. 7-100 shipping container authorizes the use of the container under the general license provisions of 10 CFR 71.12(b); and requires that (1) the contents of the secondary container meet the requirements of low specific activity radioactive material, defined in 10 CFR 71.4.(g).(i), (ii) & (iii), (2) the maximum total weight of the contents and secondary container shall not exceed 7000 pounds, and (3) lid lifting lugs shall not be used for lifting the cask and shall be covered in transit.

Contrary to the above, records of dewatered spent resins shipped from the site on July 21 and 28, 1978, and August 25 and 31, 1978, state that greater than 7000 pounds were shipped on August 25 and 31, 1978 in a Model No. 7-100 shipping container and by calculations from the recorded data, indicate that greater than LSA concentrations for Group II materials (Mixed Fission Products) had been shipped for all the above shipments. On September 12, 1978, a truck in transit was seen by the inspectors leaving the radiation controlled area with a Model No. 7-100 shipping container on a trailer with the lid lugs uncovered.

### Response B

With respect to the shipment of greater than low specific activity (LSA) concentrations, the immediate corrective action was to determine if the cited shipments were in fact less than LSA. The quantities and types of radioactive materials shipped were reevaluated and found to have been less than LSA, however, this did not alter the fact that the information available at the time of shipment indicated greater than LSA.

In order to prevent recurrence, training classes for appropriate health physics personnel were held on November 20 and 21, 1978 to review the subject of radioactive material shipment. Compliance was achieved as of November 21, 1978.

To provide further assurance of preventing recurrence, the appropriate health physics procedure will be revised to include checklists to be used when shipping radioactive materials. The checklists will be based on the certificates of compliance for the shipping containers that we use. Furthermore, the effectiveness of corrective action regarding the shipment of radioactive material will be audited during the first half of 1979.



### Finding C

Technical Specification 6.13.1.b states that "each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1(a) and, in addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under administrative control."

Contrary to the above, on September 12, 13 and 14, 1978, radiation levels in two high radiation areas inside reactor containment exceeded 1000 mrem/hr and no locked doors were provided for these individual areas. The areas were: 18 inches from regenerative heat exchangers where levels ranged from 1000 to 3000 mrem/hr, and 18 inches from reactor cavity filters where levels ranged from 1500 to 2500 mrem/hr. The reactor was shut down and the areas were accessible to service personnel.

### Response C

As a result of the finding, we have reviewed Technical Specification 6.13.1 and Part 20.203(c)(2) of 10 CFR 20, which is modified by the Specification. In our opinion, the conditions cited do not constitute an item of noncompliance. Our opinion is based on the fact that both high radiation areas cited in the finding are located inside containment. We have identified the inside of containment as a high radiation area and have provided it with a locked door as required by Technical Specification 6.13.1.b. The area is maintained locked except during periods when access is required, at which times entry is controlled in accordance with 10 CFR Part 20.203(c)(2)(iii).

Our review to date indicates that a revision to Technical Specification 6.13.1 might be useful. The intent of such a revision would be to clarify the Specification with respect to high radiation areas inside containment, to preclude differing interpretations by reviewers, and to bring the Specification in line with the underlying regulation. We plan to submit the proposed revision to the Office of Nuclear Reactor Regulation by about December 31, 1978.

We view the finding as representing a valid concern about the control of radiation exposure to our workers, and we recognize that it is proper to improve that control whenever such improvement is reasonably achievable. With respect to the two areas cited in the finding, we intend to take the following actions:

- (1) A locked enclosure will be installed around the Unit 3 regenerative heat exchanger no later than 30 days after the beginning of the next Unit 3 refueling outage (scheduled to begin about January 1, 1978). At the present time, similar action is planned for the Unit 4 refueling outage (scheduled to begin March 25, 1979).
- (2) The radiation area around the reactor cavity filters will be controlled by one or more of the following methods:
  - a) Changing the filters before the radiation level exceeds 1000 mrem/hr.

Response C (Continued)

- b) Shielding the filters with lead shielding and changing the filters before the radiation level outside the shielding exceeds 1000 mrem/hr.
- c) Turning the cavity filtration system off before the filter radiation level exceeds 1000 mrem/hr.

If radiation levels exceed 1000 mrem/hr., additional controls over access to the area around the filters will be instituted until the radiation level can be reduced.

Further action is planned to evaluate exposure control inside containment during periods when the reactor is shutdown and workers have access to the containment. Containment radiation surveys will be made during the next refueling of each unit and, based on evaluation of the results, additional controls may be established to help maintain exposure to our workers as low as reasonably achievable.