FPL
FLORIDA POWER & LIGHT COMPANY

December 19, 1978
L-78-394

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:RWZ
50-250/78-26
50-251/78-26

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,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU/MAS/cpc

Attachment

cc: Robert Lowenstein, Esquire

7901180052

780112
FULL COPY

ATTACHMENT

Re: RII:RWZ
50-250/78-26
50-251/78-26

Finding A

Technical Specification 6.13.1.a requires, in part, that "each high radiation area in which the intensity of radiation is greater than 100 millirem/hr, but less than 1000 millirem/hr, shall be barricaded and conspiciously posted as a high radiation area."

Contrary to the above, on October 30-31, and November 1, 1978 a high radiation area in the north filling room of the Radwaste Building was unposted and unbarricaded and the intensity of radiation in the area was 120 millirem/hr.

Response A

The corrective action was to close the door to the north filling room. At that time, the door constituted the barricade to the room, and a high radiation area sign was on the door. This action was taken during the inspection and achieved compliance with the cited requirement.

To help prevent recurrence of the failure to provide continuous posting of the room, the high radiation area sign has been suspended from the doorway rather than being left on the door. To help prevent recurrence of the failure to barricade the room, the barricade has been redesignated as the cord which suspends the high radiation area sign across the doorway.

Finding B

Technical Specification 6.13.1.b requires that "each high radiation area in which the intensity is greater than 1000 millirem/hour shall be "barricaded and posted" and "shall be provided with a locked door to prevent unauthorized entry."

Contrary to the above, on October 31, 1978, a door to the Waste Holdup Tank room on the 4 foot elevation and a door to the Pipe Chase on the 10 foot elevation in the Reactor Auxiliary Building were open, the areas were unoccupied, and radiation levels in the Waste Holdup Tank Area were 1000 to 2000 millirem/hr and in the Pipe Chase were 2000 to 3000 millirem/hr.

Response B

The corrective action was to close and lock the doors. This was accomplished during the inspection and achieved compliance with the cited requirement.

To help prevent recurrence, the following actions were taken:

1) Plant personnel were instructed at safety meetings by plant management to keep the doors closed and locked when the spaces were unoccupied.

2) Automatic spring door closures were installed on the doors.

3) New locks were installed which automatically latch to lock the doors when the doors are closed.

Finding C

10 CFR 20.203(c)(3) requires, in part, that the controls for each entrance or access point to a high radiation area "shall be established in such a way that no individual will be prevented from leaving a high radiation area."

Contrary to the above, on October 31, 1978, the sliding bolt lock on the steel door at the access point to a high radiation area the Waste Holdup Tank Room, precluded exit from the room with the bolt in place.

Response C

The corrective action was to disable the lock which precluded exit from the room. This action was taken during the inspection and achieved compliance with the cited requirement.

Disabling the lock will prevent recurrence of this finding.

Finding D

Technical Specification 6.11 states that, "procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure." Health Physics Procedure HP-41, "Movement of Materials Inside the Radiation Control Area," requires that (1) externally contaminated material that is to be moved from one work site to another or placed in storage shall, whenever possible, be contained in double polyethylene bags and the bag openings shall be double sealed to prevent the release of contamination and (2) all radioactive material that is to be stored shall have a radioactive material "Caution" bag affixed.

Contrary to the above, on October 31, 1978, and November 1, 1978, untagged, opened bagged, singly bagged and unbagged contaminated material was stored under the tool room and on the ramp from the four foot to ten foot elevations in the Reactor Auxiliary Building. Radiation levels for material under the tool room ranged up to 5 mr/hr and for material on the ramp up to 30 mr/hr.

Response D

The following corrective actions were taken:

1) The contaminated material found on the ramp was removed and placed in proper storage in accordance with applicable procedures.

2) The area under the tool room was designated as a radioactive storage area and the material stored there was properly tagged and bagged in compliance with Operating Procedure 11550.41 (Movement of Material Inside the Radiation Controlled Area).

These actions were taken prior to December 13, 1978, by which time full compliance was achieved.

To help prevent recurrence, plant personnel were instructed at safety meetings by plant management to properly tag, bag, and store contaminated waste material in accordance with established procedures.

Finding E

Section 6.8.1 of the Technical Specification requires in part that, "Written procedures and administrative policies shall be established implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33 ..." Operating Procedure 0202.1, Section 8.3, entitled "Reactor Startup Cold Condition to Hot Shutdown Conditions", for FP&L Turkey Point Units 3 and 4, requires in part that the containment be inspected for cleanliness and further "Verify that any items that could be washed down during a LOCA, including by containment spray, and potentially clog the containment sumps, have been removed from the containment or properly and securely stored."

Contrary to the above, on November 1, 1978, there were two unsecured yellow plastic open containers one-half to three-quarters full of anticontamination clothing (including rubbers, plastic bags and tape) inside the Unit 3 containment at the personnel hatch with the reactor at 100% power.

Response E

The corrective action was to remove the containers from the containment. This action was taken prior to December 7, 1978, by which time full compliance was achieved.

To help prevent recurrence, Operating Procedures 0202.1 (Reactor Startup, Cold Conditions to Hot shutdown Conditions) and Operating Procedure 0202.2 (Unit Startup, Hot Shutdown to Power Operation) were revised on December 8, 1978, to provide more definitive guidance regarding what material may be left in containment at power and what material must be removed.

Status of Commitments

The purpose of the November 3, 1978 discussion between Mr. C. O. Woody and members of your staff was to stress the high degree of FPL management concern and describe the actions we had taken or were planning to take in response to the situation. We would like to take this opportunity to inform you of the current status of these items.

1. Ten new health physics positons were authorized November 3, 1978. Four of the positions are for personnel in the Radiation Protection Man classification, and six are for technician level positions. The positions are being filled as expeditiously as possible.

2. As of November 3, 1978, two maintenance personnel were assigned full time to the Health Physics Department. The two positions may not be reassigned without the prior approval of the Plant Manager.

3. The Corporate Health Physicist has been spending two days per week at Turkey Point since the week of November 6, 1978.

4. The plant has completed its reviews of the noncompliances identified by the NRC between January and November 1978 and the corresponding corrective actions. We intend to extend this review to 1977 noncompliance items.

5. Plant personnel have been instructed by plant management at safety meetings that full compliance with health physics procedures is mandatory. In addition, this has also been discussed and emphasized in individual crew meetings.

6. The plant has completed its review of the controls on access to areas with radiation fields greater than 1000/mrem/hr. The review has prompted several changes in the areas of locks and door closure devices. This also includes changing the manner in which areas less than 1000 mrem/hr are posted.

7. Several areas of responsibility previously under the Quality Control Department, but not falling under the strict definition of quality control, have been reassigned to other plant departments to make available additional manpower for quality control activities.

8. All individuals acting as quality control inspectors have been assigned under the functional direction of the Quality Control Supervisor.

9. Plant personnel have been instructed by plant management at safety meetings that full compliance with license requirements is mandatory.