FLORIDA POWER & LIGHT COMPANY

September 23, 1980
L-80-316

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:RZ
50-250/80-17
50-251/80-15

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,

J. A. De Mastry
on

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/md

Attachment

cc: Mr. Harold F. Reis, Esquire

RESPONSE TO USNRC INSPECTION REPORT 80-17 AND 80-15

APPENDIX A

FINDING A:

Routine radiation and contamination surveys were not being conducted outside the Radiation Controlled Area (RCA). As a result, the licensee was unaware that the South East sector of the plant grounds was contaminated due to steam generator explosive tube plugging operations in January coupled with inversion type meterological conditions existing at that time. In addition, electrical vaults outside the RCA became contaminated due to problems with the "A" CVCS holdup tank. Adequate surveys by the licensee could have identified and solved these problems before the inspectors found them. (Section 7) In addition, the failure to perform adequate surveys directly contributed to the item of noncompliance (Item B) listed in Appendix B.

RESPONSE:

We have posted and labeled these areas with signs stating "Caution Radioactive Material". Surveys outside the RCA were completed by May 13, 1980.

These surveys will be continued on a quarterly basis.

FINDING B:

The direction of ventilation flow in the Auxiliary Building and Radwaste Building in some cases flows from areas of high contamination to areas of lower contamination. The inspectors found a flow of air coming from the decay heat pits and equipment decontamination room into the hallways of the Auxiliary Building. Over the years the ventilation system has been modified, but the entire system has not been rebalanced. The ventilation systems in the Auxiliary Building and the Radwaste Building need to be balanced to assure proper air flow and thereby reduce the possibility of the inadvertent spread of contamination.

RESPONSE:

A ventilation system test is being prepared to address the conditions noted in the finding. Upon completion of the test, any modifications necessary to correct imbalances in the air flow will be made.

FINDING C:

The normal containment building exhaust system was not adequately maintained. The change-out of the roughing filters was not covered by procedures and actual field inspection revealed the filters were overloaded with dust, to such an extent that the filter medium was separated from its frame in more than 50% of the filters. The filters need to be changed and maintained in an acceptable condition. (Section 7.a and 8.b) The inadequate maintenance of the roughing filters directly contributed to the contamination found in the South East sector of the plant, as discussed in Item A above.

APPENDIX A (cont'd)

RESPONSE:

We have determined that it is necessary that a preventative maintenance program be established to inspect and change as appropriate the filters on a periodic basis. This program is part of a revision to the Plant's preventative maintenance program which is scheduled for implementation on January 1, 1981. A portion of the filters identified in the report have been replaced. The remaining filters will be changed on receipt of sufficient filter material, which is expected shortly.

FINDING D:

An adequate radiological engineering group or ALARA group does not exist. For example, an adequate radiological engineering evaluation of the steam generator explosive plugging operation was not performed. Alternate means of limiting the spread of contamination due to explosive plugging are available and are commonly used, e.g. expandable bags, mechanical plugs, and HEPA filters. Had these alternatives been evaluated and used as appropriate prior to explosive plugging operations back in January, 1980, many of the problems identified in this report would not have occurred. A radiological engineering group or an ALARA group should be formed to evaluate proposed problems and plan action to prevent occurrence of these problems.

RESPONSE:

We have evaluated methods of tube plugging and have decided to use mechanical plugs in the future. We are presently evaluating a steam generator ventilation system in the event that we have to use explosive plugging in the future. Although we presently practice ALARA Program methods in many areas, we realize that a formal documented ALARA Program is essential. This program is being developed with implementation scheduled for 1981.

APPENDIX B

FINDING A:

As required by 10 CFR 20.105.b(1), "no licensee shall possess, use or transfer licensed material in such a manner as to create in any unrestricted area . . . radiation levels which, if an individual were continuously present in the area, could result in his receiving a dose in excess of two millirems in any one hour . . ."

Contrary to the above on May 8, 1980, the radiation level on the readily accessible radwaste discharge piping in the unrestricted area was at 3.5 millirem/hr for at least one hour.

RESPONSE:

As corrective action, the piping in the finding has been labeled with signs stating "Caution Radioactive Material" and area surveys were conducted. In order to prevent recurrence, these surveys will be continued on a quarterly basis.
Full compliance was achieved on May 8, 1980.

FINDING B:

As required by 10 CFR 20.201 (b) "Each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in this part".

1. Contrary to the above on May 8, 1980, surveys were not performed to assure compliance with 10 CFR 20.207 (b) in that licensed material was undetected and thus unattended and uncontrolled in the South East sector of the backyard beyond the protected area fence.

2. Contrary to the above on May 8, 1980, surveys were not performed to assure compliance with 10 CFR 20.105.b(1) in that licensed material was found in electrical vaults outside the restricted area and radiation dose rates in the lower portions of the vaults were 2.5 millirem/hr for at least one hour.

RESPONSE:

Part (1):

As corrective action, the area in the South East sector of the backyard beyond the protected area was posted with signs stating "Caution Radioactive Material", and plans were formulated to remove the contaminated dirt. This removal of the dirt commenced on May 17, 1980, and as of this date approximately 75% of material has been drummed and removed. In order to prevent recurrence we will begin conducting quarterly surveys of these areas.

Full compliance was achieved by May 16, 1980.

APPENDIX B (cont'd)

Part (2):

As corrective action, the electrical vaults were posted with signs stating "Caution Radioactive Area" and area surveys were conducted. These areas are at present still posted, and decontamination techniques are being studied to find methods to reduce the contamination levels below those required by 10 CFR 20.105.b(1). In order to prevent recurrence of this finding, the area surveys will be continued on a quarterly basis.

Full compliance was achieved by May 8, 1980.

FINDING C:

As required by 10 CFR 20.203(f)(1) "each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents . ."

Contrary to the above on May 8, 1980, an unmarked drawer in the chemistry lab had numerous reactor coolant sludge samples which contained greater than Appendix C quantities of radioactive material. One sample had a contact reading of approximately 200 millirem/hour.

RESPONSE:

As corrective action, the drawer in the chemistry lab was labeled, "Caution Radioactive Materials". In order to prevent recurrence, the entrance door to the chemistry lab has also been posted with a sign stating "Caution Radioactive Material".

Full compliance was achieved by May 8, 1980.