UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. 50-250-SP
	)	50-251-SP
FLORIDA POWER & LIGHT COMPANY	)	
	)	(Proposed Amendments to
(Turkey Point Nuclear	)	Facility Operating License
Generating Unit Nos. 3	)	to Permit Steam Generator
and 4)	)	Repairs)

AFFIDAVIT OF HARVEY F. STORY ON CONTENTION 8

My name is Harvey F. Story. My business address is 6040 S.W. 82 Avenue, Miami, Florida 33143. I am a certified Health Physicist and President of Nuclear Power Resources, Inc.. A statement of my professional background and qualifications is attached to this affidavit.

I was employed by Florida Power & Light Company from September, 1970, until March 31, 1981. During the last five years, I was the Corporate Health Physicist. I am familiar with all aspects of FPL's radiation monitoring program for Turkey Point, as well as the radiation monitoring measures connected with the Steam Generator Repair Project. I am also familiar with the practices used to monitor radioactivity in nuclear power plants in the United States.

This affidavit addresses Contention 8 which states:

The proposed method of radiation monitoring during repair of the steam generators will not provide accurate information to comply with 10 CFR Parts 20 and 50.

RADIATION MONITORING

Radiation monitoring can be divided into three general areas and FPL provides equipment and detailed procedures for all three. The three areas are process and effluent monitoring, plant and area monitoring, and personnel monitoring. This affidavit describes existing procedures at Turkey Point with respect to each of the three areas as well as the additional measures which will be taken in connection with the Steam Generator Repair Project.

I. Process and Effluent Monitoring

Process monitoring refers to radiation monitors that automatically monitor plant processes and effluents to measure levels of radioactivity. These monitors give continuous indications of radiological conditions and therefore provide early indication of malfunctions which could lead to unsafe radiological conditions. For instance, liquid and gaseous effluent releases from the primary side are required to pass through a process monitor before or during discharge. If activity exceeds a predetermined value, the monitor automatically alarms. Additionally for releases from liquid tanks, Gas Decay tanks, and containment purging, the monitors will also automatically initiate termination of the release when a setpoint is exceeded. Releases from the secondary side are monitored or sampled prior to release.

Process monitors are calibrated by trained technicians using a known radiation source composed of liquid or gaseous radionuclides. The known sources are standardized by laboratory procedures using sources that are traceable to National Bureau of Standards (NBS) standards.

A Gaseous Effluents

1. Current Program

In order to ensure that airborne releases from the plant comply with requirements of both the Technical Specifications and 10 CFR Part 20, Appendix B, Table II, a series of administrative controls and process radiation monitors are employed.

Prior to any release from a gas decay tank or purging from a containment, samples are taken for gas, particulates, iodine and tritium. Based on known dilution flows through the vents, release rates are adjusted to comply with the above requirements. Prior to any release, a release permit is prepared by the nuclear chemistry department and is signed by the plant radiochemist, plant health physicist and the nuclear plant supervisor.

All primary side vents from the plant contain process radiation monitors with alarm and/or trip setpoint functions. Setpoints are set to ensure that Technical Specifications and 10 CFR Part 20, Appendix B, Table II limits are not exceeded. The following describes the process monitors for airborne activities and the functions of these monitors:

R-11 -- Samples particulate activity inside containments; one for each unit; alarm trip tied to containment purge lines.

R-12 -- Samples gas activity inside containments; one for each unit; alarm trip tied to containment purge lines.

R-14 -- Located in plant vent stack; monitors effluents from both containments, auxiliary building, No. 4 spent fuel pit, and gas decay tanks; alarm trip function tied to gas decay tank releases.

R-15 -- Located in the air ejector; one for each unit; monitors for the potential of radioactive gases being removed as non-condensable gases from the secondary system by the air ejector.

The above monitors were installed prior to plant operation.

In addition two monitors are installed as follows:

A. A plant vent monitor is located on the auxiliary building and designed to monitor gas, iodine and particulates from samples taken offline from the plant vent stack.

B. The Unit No. 3 spent fuel pit monitor is located on the roof of the auxiliary building and designed to monitor gas, iodine and particulates from samples taken offline from the No. 3 spent fuel pit stack.

2. Steam Generator Repair Program

The existing airborne radiation monitors will also be used to monitor for effluents that may be produced during the steam generator repair. In addition, the supplementary containment purge system will include a continuous radiation monitor. In this connection, it should be noted that during the repairs all gaseous effluents will be released through the primary side vents or the supplementary containment purge system. Finally, periodic grab samples will be taken in work areas where there is a potential for airborne contamination.

In short, all gaseous effluents generated by the repair will be monitored during the release.

B. Liquid Effluents

1. Current Program

All primary side liquid releases are made from collecting tanks. This includes such liquids as processed primary coolant, laundry water, and decontamination fluids. An extensive program is carried out to ensure that any release from collecting tanks will not exceed limits contained in Technical Specifications or 10 CFR Part 20, Appendix B, Table II.

Prior to making such a release, the liquid in the tanks is recirculated and sampled for isotopic activity. Calculations are

performed to ensure that release rates or curie content limits will not be exceeded. The total activity and concentration of the liquid along with the release limits are logged on a liquid release permit which is prepared by the nuclear chemistry department and signed by the Nuclear Plant Supervisor. Should the measured activity be greater than 5×10^{-5} uci/ml, the plant radiochemist and the plant health physicist must also sign the release permit.

In addition to the above program, further assurance of compliance is provided by the R-18 process radiation monitor which is located in the liquid release discharge line. This monitor is provided with an alarm trip setpoint which, when exceeded, terminates the release. Setpoints are calculated to ensure limits will not be violated.

If radioactivity should enter the secondary system, liquid activity will be released through normal blowdown of the steam generators. Sampling of steam generator blowdown is routinely conducted. Should such sampling disclose that radioactivity levels have increased in the secondary system above threshold values, a more extensive sampling program is initiated. This sampling program calls for continuous updating of release information to ensure no Technical Specifications or 10 CFR Part 20 limits are exceeded.

As with the R-18 process radiation monitor for normal liquid releases, the R-19 process radiation monitor with an alarm trip setpoint function provides additional assurance that no limits will be violated for secondary steam generator coolant releases. The R-19 monitor is located in the steam generator sample line. Should its setpoint be exceeded, blowdowns are diverted to the waste holdup tank.

Secondary coolant water is sampled for radioactivity and a similar permitting procedure and/or administrative controls are used prior to release.

2. Steam Generator Repair Program

The current sampling and monitoring program will be used during the repair project.

The secondary coolant water will be released from the unit under repair. Due to the frequent sampling and monitoring activities of the steam generator secondary water, the concentrations will be accurately known and releases will be controlled by release permits to avoid exceeding any release limits.

All laundry water and all processed reactor coolant system water that is discharged will be sampled and then released through the R-18 process radiation monitor, which is set to terminate the release if a release limit is reached.

In short, all liquid effluents generated by the repair will be monitored prior to release.

II. Plant and Area Monitoring

Plant and area monitoring refers to detection and measurement of radiation and contamination in and around the plant. Part of the plant monitoring is performed automatically by the Area Radiation Monitoring System (ARMS). A second part consists of surveys performed with portable survey instruments and laboratory instruments. The third part is performed by environmental type samples and survey and laboratory instruments.

A. Area Radiation Monitoring Systems

1. Current Program

The ARMS consists of radiation monitors with indication and alarm capabilities located strategically throughout the plant. The ARMS provides continuous monitoring with alarms to give early indication

of changes in local radiation levels. The ARMS monitors are calibrated by trained technicians using a sealed source that is traceable to NBS standards.

The following is a description of the ARMS:

Channel No.*	Area Monitor
1	Personnel Air Lock - Unit 3
2	Fuel Manipulator Crane - Unit 3
3	Incore Detector Seal Table - Unit 3
4	Personnel Air Lock - Unit 4
5	Fuel Manipulator Crane - Unit 4
6	Incore Instrumentation - Unit 4
7	Spent Fuel Pit Transfer Canal - Unit 3
8	Spent Fuel Pit Transfer Canal - Unit 4
9	Tank & Pump Room
10	Chemical Storage Area
11	Cask Wash Area - Unit 4
12	Cask Wash Area - Unit 3
13	Sample Room - Unit 3
14	Sample Room - Unit 4
15	North End of North/South Corridor
16	South End of North/South Corridor
17	East End of East/West Corridor
18	West End of East/West Corridor
19	Spent Fuel Pit Exhaust - Unit 3
20	Control Room
21	Spent Fuel Pit North Wall - Unit 3
22	Spent Fuel Pit South Wall - Unit 4

Each channel consists of a detector, a local indicator and a cabinet mounted indicator in the control room. Radiation levels exceeding the alarm setpoint actuate a buzzer, a red light and the control room annunciator.

* A channel consists of a monitoring function and associated equipment including detector, readouts and connecting wiring.

2. Steam Generator Repair Program

During the repair program the ARMS will be in operation to indicate any increases in radiation levels due to work activities.

Additionally, portable area radiation monitors will be utilized for the repair project. They will be placed in strategic work and occupancy locations to monitor radiation levels, such as in the area of the steam generators or in other areas where significant radiation levels are expected. These monitors will provide continuous indication of radiation levels and, when needed, capability for local alarms or remote alarms at control points.

B. Radiation Surveys

1. Current Program

Portable radiation monitoring and laboratory instruments are used to perform additional radiation, contamination and airborne activity surveys throughout the plant. The portable equipment and the laboratory equipment is all calibrated by trained technicians using sealed sources that are traceable to NBS standards. The frequency of these surveys depends on the potential for changes in radiological conditions and the personnel occupancy. Continuous Health Physics coverage is provided for tasks with high potential for changing radiological conditions that could result in high radiation areas or radioactive airborne areas.

In addition to various regularly scheduled surveys within the Radiation Controlled Area (RCA), surveys are regularly performed in areas outside the RCA to verify the effectiveness of the Health Physics Program designed to control radiation and contamination. These surveys include various daily, weekly, and monthly swipe tests and area monitoring. The frequency of the surveying of any particular location depends upon the potential for a change in

radiological conditions. These surveys provide assurance that radiation levels and contamination levels are known and controlled in order to limit personnel access and exposure.

2. Steam Generator Repair Program

The current routine surveys will continue during the repair program to detect and monitor radiation levels inside and outside the plant. Radiation and contamination surveys will be conducted on a daily basis during the repair project. The areas that will be surveyed will include:

a. Containment
b. All undress areas
c. All Break areas
d. Entrance and exit paths to subject containment.

Additionally, all active Radiation Work Permit areas will be monitored on a routine basis commensurate with the work activities in the areas.

The steam generator lower assemblies will be monitored as they are removed from the containment. If they are stored on site, they will receive a visual examination and a thorough radiation and contamination survey at least once a quarter. Since the lower assemblies are not expected to experience through-wall corrosion during the period of on-site storage, more frequent inspections of the lower assemblies will not be necessary.

In short, the surveys proposed for the repairs, provide assurance that radiation levels and contamination levels will be known and controlled in order to limit personnel access and exposure.

C. Environmental Surveys

1. Current Program

Dose monitoring devices (Thermoluminescent Dosimeters or TLDs) are strategically located by FPL at and beyond the protected area fence and periodically processed to monitor any increases in background radiation.

The State of Florida, Department of Health and Rehabilitative Services (DHRS) continuously conducts an environmental program to monitor direct radiation with TLDs and airborne contamination with air samples. In addition, DHRS collects periodic soil, water, vegetation, fish, crustacea, silt, and small animal samples to check for natural radiation levels.

FPL is required to report this data to the NRC on a semi-annual basis.

2. Steam Generator Repair Program

The current program will continue in operation during the repair project. The DHRS is available to perform non-routine sampling and surveying during the project should FPL require additional monitoring and provide prior notice.

In short, the environmental monitoring program during the repair provides assurance that increases in the activity levels in the environment as a result of the repairs will be detected.

III. Personnel Monitoring

The personnel monitoring program tracks both external and internal exposures. The internal monitoring program monitors radioactive materials taken into the body via inhalation, ingestion, or other means. The external monitoring program monitors radiation that originates from sources external to the body.

A. Internal Monitoring

1. Current Program

For internal exposures airborne activity monitoring is used to ensure that proper respiratory protection is provided and to calculate any potential doses that could be received. To monitor internal exposure and audit respiratory control, a bioassay program, consisting primarily of whole body counts, is used. Urine samples are routinely collected from representative personnel to check for tritium uptake. Past experience has disclosed that no significant uptake is expected. Before starting work in contaminated areas, personnel are given a whole-body count. These personnel are also given a whole-body count upon termination. In addition, when internal uptake is suspected, nasal smears and whole body counts are taken along with any other bioassay samples that may be required.

The whole body count will detect the predominant radionuclides, which are beta-gamma emitters. Alpha emitters are not likely to be present if the predominant beta-gamma emitters are not detected. Nevertheless, during the initial phases of work inside of containment at the beginning of a shutdown, air and transferable contamination samples are collected in order to confirm the absence of significant quantities of alpha emitters. Historically, no such significant quantities have been detected.

2. Steam Generator Repair Program

Additional whole-body counters will be used during the repair project. The current program for internal monitoring will be used for individuals working in contaminated areas in the RCA as follows:

1. An initial whole-body count will be taken before an individual starts working.

2. A whole-body count will be taken when an uptake is suspected. If an uptake is detected, additional whole-body counts and bioassays may be used to determine the type and quantity of radioactive materials present. Air and transferable contamination samples will also be taken in order to detect whether significant quantites of alpha emitters are present.

3. A final whole-body count will be taken upon terminating.

If a significant amount of radioactive material is detected, it is quantified, converted to dose and entered in the individual's record.

B. External Monitoring

1. Current Program

For external monitoring TLDs are used and processed at least monthly or when exposures are approaching guideline values. The program provides for special neutron TLDs when a possibility of neutron exposure exists. (Due to the removal of all fuel from the reactor vessel and containment, neutron exposure will not be a factor in the Steam Genertor Repair Project.) The Health Physics Manual specifically discusses the use of additional TLDs to provide backup monitoring and monitoring of extremeties. For instance, depending upon dose rates, wrist TLDs are utilized to ensure that exposures to the extremeties (hands and forearms) are properly monitored.

The TLD readout equipment is calibrated by trained technicians using badges that are exposed to a standard source by a third-party contractor. The TLDs are calibrated for sensitivity to a known exposure.

Specific tests have been performed in the steam generators to determine the point of highest exposure. Based upon these surveys, individuals are required to wear personnel radiation monitors in the area of their body most likely to receive the highest whole-body exposure.

In addition to the TLDs worn by all personel entering the Radiation Controlled Area, all personnel also carry self reading pocket ionization chambers (pocket dosimeters). These devices can be quickly and easily read by the individual simply by looking into the device while pointing it at a light. This allows the individual, his supervisor, and Health Physics personnel to determine his exposure at

any given time. These devices are read and the individual's exposure recorded at the completion of the work period and/or at least daily to provide assurance that applicable limits are not exceeded. The program specifically provides for using the total of the latest TLD readings and the recorded pocket dosimeter readings to track total exposure for the period of interest (day, week, quarter and year) to ensure that no exposure limits are exceeded. Pocket dosimeter readings are recorded at the exit to the Radiation Controlled Area for specific jobs. These numbers can then be used to determine if total exposures on a task are excessive and ensure that the ALARA concept is met for both individual exposure and total man-rem. It is a NRC and company requirement that detailed records of all these monitoring programs be maintained and that all personnel receive both periodic exposure information and exposure information upon termination of employment.

2. Steam Generator Repair Program

Additional TLDs, TLD readers and pocket dosimeters will be used to expand the current program to meet repair project requirements. A new real-time computer system will be used to record and analyze personnel exposures. Consequently FPL's ability to follow and update personnel exposure and track man-rem on a daily basis will improve ALARA effectiveness. The exposure records from the repair project will be maintained separately from other plant exposures.

C. Conclusion

In short, the personnel monitoring program for both internal and external exposures provides assurance that accurate monitoring information will be available for all potential uptakes or exposures.

IV. Conclusion

FPL has an extensive radiation monitoring program for Turkey Point which will be utilized during the repair project. This program consists of process and effluent monitoring, plant and area monitoring, and personnel

monitoring. It equals or exceeds industry practice and procedures for monitoring the types and quantities of radionuclides that are present at nuclear power reactors. The program, together with specific measures proposed for the repairs, will provide the capability to monitor accurately effluents generated by the repairs and to detect relevant radiation fields and radioactive contamination levels during the repairs. In summary, the proposed program will provide comprehensive monitoring for the repairs and provide assurance that accurate monitoring information will be available during the repairs to comply with 10 CFR Parts 20 and 50.

FURTHER AFFIANT SAYETH NOT.

Date 4/8/81

Harvey F. Story

STATE OF FLORIDA)
) SS.
COUNTY OF DADE)

SWORN to and subscribed before me this 8th day of April 1981.

Notary Public

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION EXPIRES AUGUST 21, 1981
BONDED THRU MAYNARD BONDING AGENCY

STATEMENT OF PROFESSIONAL QUALIFICATIONS

Harvey F. Story

Present	Certified Health Physicist President, Nuclear Power Resources, Inc. 6040 S. W. 82 Avenue Miami, Florida 33143

Professional Experience

1976-1981	FPL Power Resources Nuclear Staff-Corporate Health Physicist. Responsible for all staff activities in the areas of Radiation Protection, Emergency Planning, Radiological Environmental Monitoring, Radiochemistry, and Waste Management. Directly supervised six staff personnel. The entire company program was implemented by a total plant staff of about seventy Health Physics and Radiochemistry permanent personnel plus various consultant and service personnel.
1974-1976	FPL Power Resources Nuclear Staff Health Physicist. Developed and administered FPL corporate radiation protection program. Established centralized in-house personnel monitoring system. Spent several days each month at plant sites during shutdown and operation.
1973-1974	Assigned to St. Lucie Plant as Health Physicist. Responsible for establishing and implementing complete Radiation Protection Program, including decontamination, waste management, environmental monitoring, and emergency planning.
1971-1973	Health Physics dept., Turkey Point Plant (PTP). Acted as Assistant Health Physicist in organizing and developing Health Physics program. Wrote the majority of all health physics procedures. Responsible for the Health Physics night crew during fuel loading of Units 3&4 at PTP. Directly supervised many activities such as calibration of area monitors, changing reactor coolant filters, decontamination, etc. Assumed all of the Health Physicist's responsibilities during his absence.
1970-1971	FPL Turkey Point Plant. Assigned to procedures group. Wrote preoperational and operational procedures on primary systems such as process and area monitoring systems, reactor coolant system, and auxiliary systems.

1969-1970	Attended graduate school at Texas A&M University on a teaching assistantship. Gained limited experience in radiochemistry, reactor engineering, and health physics.
1967-1969	Freshman Chemistry Instructor; taught laboratory courses in General Chemistry & Qualitative Analysis.

Education

B.S., Chemical Engineering, Georgia Institute of Technology
M.S., Nuclear Engineering, Texas A&M University
Additional Course Work:
Nuclear Reactor Engineering, University of Missouri
Health Physics, Rockwell International
Health Physics, University of Michigan
Various industry business and management courses.

Professional Recognition

Health Physics Society
EEI Health Physics Task Force
EEI Technical Committee on Low Level Exposure
AIF Working Group on Occupational Exposure
AIF Working Group on Appendix I Technical Specifications
Member of American Board of Health Physics Examining Board for Power Reactor Health Physics Certification.
Certified by American Board of Health Physics in both General and Power Reactor Health Physics

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. 50-250-SP 50-251-SP
FLORIDA POWER & LIGHT COMPANY	)	
(Turkey Point Nuclear Generating Unit Nos. 3 and 4)	)	(Proposed Amendments to Facility Operating License to Permit Steam Generator Repairs)

LICENSEE'S STATEMENT OF MATERIAL FACTS ON CONTENTION 8 AS TO WHICH THERE IS NO GENUINE ISSUE TO BE HEARD

Licensee contends that there is no genuine issue to be heard on the following material facts:

1. Radiation detection and measurement can be divided into the general areas of process and effluent monitoring, plant and area monitoring, and personnel monitoring. The Licensee's proposed monitoring program provides equipment and detailed procedures for each of these areas. P. 2.

2. All gaseous effluents generated by the repair will be continuously monitored by plant process monitors during the release. If the activity of the effluent exceeds a predetermined value, the process monitors will automatically produce an alarm. Additionally, the gaseous effluent monitors in the plant vent stack (R-14) and inside the containment (R-11, R-12) possess an alarm trip function tied to the gas decay tank and to the containment purge lines. Pp. 2-4.

3. All liquid effluents generated by the repair will be continuously monitored by existing plant monitors or sampled prior to release. If the activity of the effluent exceeds a predetermined value, the process monitors will automatically produce an alarm. Additionally, the monitor on the liquid release discharge line is provided with an alarm trip setpoint which will terminate a release when the setpoint is exceeded. Pp. 2, 4-6.

4. During the repair, the existing Area Radiation Monitoring System will provide continuous monitoring of strategic locations throughout the plant. These monitors will give early indication of changes in local radiation levels and will actuate an alarm upon detection of radiation levels exceeding the alarm setpoints. Additionally, portable area radiation monitors, providing alarm capability when needed, will continuously monitor strategic work and occupancy locations during the repair. Pp. 6-8.

5. The current program of conducting periodic radiation, contamination, and airborne activity surveys throughout the plant will continue during the repair. The frequency of these surveys depends upon the potential for a change in radiological conditions and personnel occupancy. During the repairs, daily radiation and contamination surveys will be conducted in the containment and routine surveys will be conducted for all active radiation work permit areas commensurate with the work activities in the area. Continuous health physics coverage will be provided for tasks with a high potential for changing radiological conditions that could result in high radiation areas or radioactive airborne contamination areas. This surveying program will provide assurance that information regarding radiation and contamination levels will be available for the purpose of limiting personnel access and exposures. Pp. 8-9.

6. The current environmental radiological monitoring program conducted by the State of Florida will continue during the repairs. This program consists of continuous monitoring of direct radiation and airborne contamination and of periodic sampling of soil, water, vegetation, and animals. Pp. 9-10.

7. The existing personnel monitoring program will be utilized during the repairs. Internal exposures will be monitored by a bioassay program consisting of whole-body counts, nasal smears, and other bioassay samples and by air sampling. External exposures will be monitored by use of thermoluminescent dosimeters (TLDs) and pocket dosimeters. Under certain circumstances, additional TLDs will be used to provide backup monitoring and monitoring of extremeties. Pp. 10-13.

8. The stored steam generator lower assemblies will be subject to quarterly visual examinations, radiation surveys, and contamination surveys. Since the lower assemblies are not expected to experience through-wall corrosion during the period of onsite storage, more frequent inspections are unnecessary. P. 9.

9. The radiation monitoring equipment will be calibrated by trained technicians. Pp. 2, 7, 8, 12.

10. FPL's radiation monitoring program equals or exceeds industry practice and procedures for monitoring the types and quantities of radionuclides that are present at nuclear power reactors. P. 14.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSON

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-250-SP
50-251-SP

IN THE MATTER OF	)	
FLORIDA POWER & LIGHT COMPANY	)	(Proposed Amendments to
(Turkey Point Nuclear Generating	)	Facility Operating
Units Nos. 3 and 4	)	License to Permit Steam
		Generator Repairs)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Licensee's Motion for Summary Disposition of Contention 8, Affidavit of Harvey F. Story on Contention 8, and Licensee's Statement of Material Facts on Contention 8 as to Which There is no Genuine Issue to be Heard were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below:

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By Norman A. Coll
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April 8, 1981

*Additional Service By
Hand or Courier