

April 12, 1982
L-82-145

Mr. James P. O'Reilly
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Emergency Preparedness Appraisal

82 APR 16 10:00

USNRC REGION II
ATLANTA, GEORGIA

Florida Power and Light Company has reviewed the NRC report (50-250/81-24, 50-251/81-24) issued upon the Emergency Preparedness Appraisal conducted during the period of October 26, 1981 - November 6, 1981.

In your letter dated February 1, 1982, you requested that we report the completion of those corrective actions related to your confirmatory letter of November 13, 1981 (Appendix A) and the results of our considerations for those items listed in Appendix B of your letter. Corrective actions regarding the confirmatory letter have been described under a separate letter (dated March 3, 1982; serial L-82-79). The results of the consideration given to each of the items in Appendix B are described below:

- Item 1: Site emergency planning coordination is the responsibility of the Operations Superintendent - Nuclear who is a member of the Plant Nuclear Safety Committee. OK
- Item 2: The opportunity exists for personnel at the site, associated with emergency planning, to attend seminars and meetings by industry groups. OK
- Item 3: The Emergency Plan and procedures will be revised so as to be consistent regarding the retraining schedules for the emergency organization personnel. OK
- * Item 4: No centralized training program is planned at this time. - not responsive (NR)
- Item 5: The Emergency Plan and implementing procedures are included as part of operations personnel training. Consequently, the areas of offsite dose assessment and recommended protective actions are covered. OK
- * Item 6: The general employee training program is currently undergoing review. No commitment had been made regarding a March 1982 date as identified in section 3.1 of the appraisal report. - NR

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Emergency Preparedness Appraisal

- * Item 7: The development of approved, formal lesson plans for each lesson is currently being reviewed. -NR
- * Item 8: Since personnel with supervisory roles and emergency team leader assignments are experienced and qualified in their specific functional area, instructor standards will not be developed at this time. -NR
- Item 9: A periodic test of communications in the interim TSC to ensure operability will be developed. OK
- Item 10: Protective clothing is supplied in a locked cabinet located in the interim TSC. OK
- Item 11: Status boards are now provided in the interim TSC. OK
- Item 12: The OSC Supervisor, his alternate, and the associated responsibilities will be described in a future revision to EP-20105. OK
- * Item 13: A specific listing of the types of personnel expected to report to the OSC is still under consideration. -NR
- Item 14: An alternate OSC has been established and appropriate procedural changes will be completed by July 1, 1982. OK
- Item 15: Each manager in the Offsite Emergency Organization is provided with a procedure describing his responsibility upon activation. The ECO is responsible for activation of these personnel and the interim EOF. No further instructions are necessary for personnel who are required to report to the interim EOF. OK
- Item 16: The FPL offsite monitoring program during emergencies has changed to include use of single channel analyzers for field determination of radioiodine activity in the air. The mobile van will no longer be used for this purpose and an implementing procedure for its operation is not necessary. OK
- Item 17: The mobile van will no longer be used for field sample analysis. OK
- * Item 18: Alternatives for personnel and vehicle handling at the assembly area are being reviewed. -NR
- * Item 19: The Florida City Substation is located about 7 miles west of the plant; an alternate assembly area is not required. -NR
- Item 20: A procedure covering emergency duties at the assembly area has been developed. OK
- * Item 21: Admission of external medical support vehicles is provided for in Security procedures. Future consideration to a dedicated first aid treatment area will be given if space becomes available, in-plant. No provision for a nurse as part of the plant staff will be made, at this time. -NR

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- Item 22: Guidelines regarding the FPL KI program are being developed. OK
- Item 23: Potassium permanganate will be purchased and kept in supply onsite and at the Florida City Substation. Appropriate procedural changes will be made by July 1, 1982. OK
- ✧ Item 24: No additional provisions for collection and disposal of liquid radioactive waste at the Florida City Substation are being planned. - NR
- Item 25: As noted in Item 20, above, a procedure for the Florida City Substation (assembly area) has been developed. This procedure will be changed to include the coordination of all the various decontamination activities and will be completed by July 1, 1982. OK
- Item 26: The addition of expanded support facilities is the responsibility of the Recovery Manager. Since the need for expanded facilities would not be immediate, more definitive plans to obtain additional resources will not be discussed in the Emergency Plan. OK
- Item 27: Space for the media at the near-site media center is adequate for its intended use. A total of 30 telephone lines are available at the Homestead National Guard Armory. OK
- Item 28: As previously discussed, the mobile van will not be used for emergency offsite monitoring. OK
- Item 29: The equipment available in the emergency kits is presently being evaluated based upon experiences noted in the recent exercise. All the kits will be stocked with new equipment and in most cases larger quantities of existing supplies. This upgrading of emergency kits should be completed by July 1, 1982 with the exception of respiratory equipment, as noted in Item 33, below. OK
- Item 30: The SPING-4 is operational and can provide the required backup sample point for the Unit 3 Spent Fuel Pit. OK
- ✧ Item 31: The meteorological system recorder will not be relocated. - NR
- Item 32: A more refined offsite dose assessment methodology is currently under development. This refined method will address land-sea effects. OK
- Item 33: A study of the emergency respiratory protection requirements and capabilities should be completed by July 1, 1982. OK
- Item 34: The provisions already exist regarding damage control/corrective action through the personnel at the OSC and supplies/equipment onsite. Increased staffing can be obtained from the remainder of the FPL system and the Bechtel Power Corporation through existing maintenance contracts. Additional equipment and supplies are available throughout the FPL system. OK
- Item 35: Reserve quantities of emergency equipment and supplies are stocked in plant stores. Additionally, these supplies can be provided by the St. Lucie plant. OK



Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Emergency Preparedness Appraisal

- Item 36: Emergency Response Teams, requiring transportation, would typically use their personal vehicles, however access to company vehicles is readily available for emergency use. OK
- Item 37: Procedural deficiencies and inconsistencies in emergency health physics procedures have been corrected. OK
- Item 38: Wind direction in degrees and air ejector contribution to releases are now provided in EP-20126. OK
- Item 39: Field sampling analysis of radioiodine is now performed utilizing a portable sodium iodide detector/single channel analyzer combination. This system decreases the time required to obtain the results of sample analysis. OK
- Item 40: Offsite survey procedures now address use of respirators, dosimeters, and protective clothing for offsite monitoring teams. OK
- Item 41: Consideration is presently being given to the development of a new
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Item 42: Health Physics procedure for onsite activities during an emergency. These two items will be clarified either in this new procedure or by modification to the existing HP-91 procedure by July 1, 1982. OK
- Item 43: Appropriate procedural changes were made to incorporate the location for making these measurements. OK
- Item 44: Chemistry procedures will be revised by June 1, 1982 to specify the use of silver zeolite cartridges for effluent gas monitoring. OK
- Item 45: Chemistry procedures will be updated by June 1, 1982 to incorporate shielding, labeling, and disposition of samples. OK
- Item 46: Chemistry procedures will be updated by June 1, 1982 to incorporate the identification of the person to whom the sample analysis data is reported to. OK
- Item 47: This procedure has been revised to incorporate the processing of environmental TLD's during emergencies. OK
- Item 48: The Emergency Plan and procedures are now consistent. OK
- Item 49: Guidelines reflecting emergency thyroid doses will be addressed in the next Emergency Plan revision. OK
- * Item 50: The marking of evacuation routes is undergoing further consideration. OK
- Item 51: Removal of injured personnel from some of the "more difficult" locations in the plant will be considered in the conduct of future medical drills and will be considered during annual retraining of the First Aid/Decontamination Team. OK
- Item 52: Guard force orders have been revised to address the duties of security personnel at the assembly area. OK

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Emergency Preparedness Appraisal

Item 53: Guidance for access and egress during prolonged site evacuations is under development and will be completed by May 1, 1982. *ok*

Item 54: The rumor control program is addressed in the Emergency Plan. Additionally, the public information booklets distributed to the population within the plume exposure pathway EPZ addresses the access of accurate information. *ok*

Item 55: HP-90 has been changed to clarify the inventory frequency and includes a reference to inventory sheets. *ok*

Item 56: The inconsistencies identified in the coordination and administration of the onsite drill program have been corrected. Additional areas for improvement of this program are being considered. *ok*

Item 57: Health Physics Drills will be conducted semi-annually. *ok*

Item 58: All required drills will be documented. *ok*

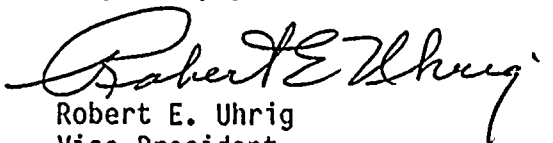
Item 59: Emergency Plan Implementing Procedures are under continuing review by the plant staff and Emergency Planning Supervisor which precludes the necessity for an annual review. Annual exercises identify procedural weaknesses which may require changes to these procedures. Additionally, when the Emergency Plan is revised, these procedures are reviewed for consistency with the plan. *ok*

Item 60: A discussion of the specific types of personnel who may be utilized for drill/exercise evaluation is not appropriate for the Emergency Plan or procedures. Qualified personnel will be chosen to perform the evaluation function. *ok*

Item 61: This annual program is already provided for and will be discussed in the next Emergency Plan revision. *ok*

This satisfies our commitments in regard to the Turkey Point Emergency Preparedness Appraisal. Should you require any further clarification regarding this appraisal, please contact this office.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JJM/mbd

cc: Harold Reis, Esquire
Brian K. Grimes

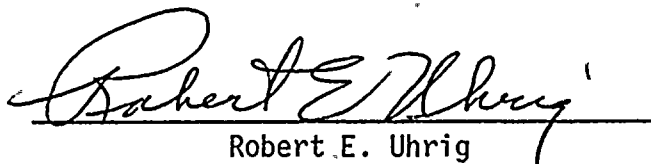


STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

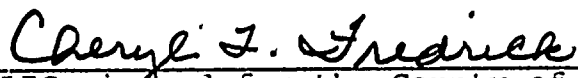
That he is Vice President of Florida Power & Light Company, the herein;

That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said


Robert E. Uhrig

Subscribed and sworn to before me this

12 day of April, 1982


NOTARY PUBLIC, in and for the County of Dade,
State of Florida

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency

