

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8803040123 DOC. DATE: 88/02/26 NOTARIZED: NO DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

AUTH. NAME: CONWAY, W.F. AUTHOR AFFILIATION: Florida Power & Light Co.  
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/87-48 & 50-251/87-48. Corrective actions: personnel disciplined.

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FEBRUARY 26 1988

L-88-98

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Reply to Notice of Violation  
Inspection Report 87-48

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

Very truly yours,

*W. F. Conway*  
W. F. Conway  
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator,  
Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

SDF/026.IR

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PDR ADOCK 05000250  
Q DCD

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## ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NO. 50-250, 50-251  
NRC INSPECTION REPORT 250-87-48 & 251-87-48

### FINDING

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained to meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33.

Regulatory Guide 1.33, Appendix A recommends that the licensee have procedures addressing radiation work permits, records retention and replacements of filters.

### EXAMPLE 1

Licensee Procedure HPA-002, August 12, 1986, Section 3.2.1. requires individuals to fully understand and follow all requirements of the Radiation Work Permit (RWP).

RWP 87-2318, RCA & Radwaste Building (RWB) High Level Storage Area (HLSA) Transport High level Radioactive Material to and from RWB HLSA, dated January 1, 1987, requires that the Plant Supervisor - Nuclear or Watch Engineer be notified before transferring high level material to or from the HLSA in the RWB.

Contrary to the above, on September 30, 1987, proper notification was not provided to the Plant Supervisor - Nuclear nor Watch Engineer prior to moving a high radiation level, 40 R/hr, seal water injection filter.

### RESPONSE:

- 1) Florida Power & Light concurs with this example of the finding.
- 2) The individual who moved the filter was fully aware of the requirement to notify the Plant Supervisor - Nuclear (PSN) prior to moving the filter. He had difficulty in reaching the Plant Supervisor - Nuclear (PSN). The reason for the violation was personnel error, in that the individual moving the filter exercised poor judgement in not persisting in his attempt to communicate with the Plant Supervisor - Nuclear (PSN).
- 3) As immediate corrective action, the individual was consulted and appropriate disciplinary action was taken. The individual was fully aware of his responsibilities in accordance with the controlling Radiation Work Permit. This violation was an isolated case.

- 4) A Plant Nuclear Safety Committee approved Health Physics Instruction "HPI-8 - Removal and Transportation of Used CVCS Fluid Filters", was written and issued. This Instruction includes a documented "Sign-off" section which requires the Health Physics Technician to record the name of the Plant Supervisor - Nuclear or Assistant Plant Supervisor - Nuclear who is notified of the filter transport.
- 5) Full compliance for item 3 above was achieved on October 5, 1987.  
Full compliance for item 4 above was achieved on October 8, 1987.

EXAMPLE 2:

Plant Procedure HPI-8, Removal and Transfer of Reactor Coolant System Filter System, dated October 8, 1987, details guidance for the replacement and transferring of spent reactor coolant system (RCS) filters.

Contrary to the above, as of December 11, 1987, Radiological Controls specified in the procedure were inadequate in that dose rates for modifying, limiting, and or terminating activities during the work evolution were not specified.

RESPONSE:

- 1) Florida Power & Light concurs with this example of the finding.
- 2) When HPI-8 was implemented, Turkey Point's Job Hazard Evaluation System (JHES) required the Health Physics Operations Supervisor to review the requirements of our Radiation Work Permit; however, there was no special guidance to predetermine filter dose rates.
- 3) A directive from the Health Physics Supervisor was issued on December 11, 1987, stipulating initial guidance for appropriate radiological precaution.
- 4) The Florida Power & Light Corporate Health Physics staff will assist the Health Physics Department in further development of appropriate criteria for modifying, limiting and/or terminating activities during filter changing. Health Physics Instruction (HPI-8) will be revised to include this additional guidance.
- 5) Full compliance for item 3 above was achieved by December 11, 1987.  
Full compliance for item 4 above will be achieved by April 30, 1988.

EXAMPLE 3:

Plant Procedure HP-101, Radiological Investigation Reports, (RIRs) dated June 23, 1987, states that a Radiological Investigation Report, Form HP-12 "should" be filled out for personnel contamination events in excess of 1,000 dpm/probe area.

Contrary to the above, as of December 11, 1987, the procedure was inadequate in that a personnel contamination event occurring on May 21, 1987, which required extensive decontamination efforts and subsequent precautionary whole body counting analyses and internal exposure evaluations, was not required to be documented in a Radiological Investigation Report.

RESPONSE:

- 1) Florida Power & Light concurs with this example of the finding.
- 2) At the time of the incident Plant Procedure HP-101 contained inadequate guidance in that it did not address initiation of an RIR upon performance of multiple special whole body counts.
- 3) A directive from the Health Physics Supervisor has been issued which requires an RIR to be written for all Multiple Special Whole Body Counts and /or Internal Exposure Evaluations.
- 4) Turkey Point's RIR Program has undergone an extensive review. Procedure HP-101 will be revised and upgraded based on the findings of this review.
- 5) Full compliance for item 3 above was achieved by February 11, 1988.

Full compliance for item 4 will be achieved by May 31, 1988.

EXAMPLE 4:

Plant Procedure HP-101, dated June 23, 1987, states that the Health Physics Supervisor is responsible for the review of all investigation reports, recommending corrective action or concurring with correction action taken by responsible supervision to prevent recurrence of the event.

Contrary to the above, the licensee failed to maintain the investigation report and/or records indicating that the Health Physics Supervisor had reviewed, recommended, and concurred with, corrective actions taken in regard to a Radiation Incident Report issued on September 29, 1987, regarding contaminated material found outside of the radiation control area.



RESPONSE:

- 1) Florida Power & Light concurs with this example of the finding.
- 2) The root cause of this event was inadequate control over the generation and processing of RIRs. No procedural controls assuring the proper processing of RIRs were in place. In this particular event, an RIR was written, but misplaced.
- 3) On an interim basis, all RIR Reports are collected and discussed by the Health Physics Supervisor during the daily morning Health Physics staff meeting.
- 4) The review performed on Turkey Point's RIR system indicated that the Procedure HP-101, Radiological Investigation Report, needs to be revised. Included in the revision of our RIR Program is a tracking/trending system which will assure all RIRs (HP-12 Forms) that are initiated will be reviewed by the Health Physics Supervisor and retained in accordance with Technical Specification 6.8.1.
- 5) Full compliance for item 3 above was achieved by February 23, 1988.

Full compliance for item 4 will be achieved by May 31, 1988.

PWH/eb/023/4

