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 WOODY,C.O. Florida Power & Light Co.
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SUBJECT: Responds to violations noted in Insp Repts 50-250/89-14 &
 50-251/89-14.Corrective actions:training program reviewed.

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JUNE 12 1989

L-89-215

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
Inspection Report 89-14

Florida Power & Light Company (FPL) has reviewed the subject inspection report. As requested, FPL's assessment of the weaknesses identified is attached.

Very truly yours,

C. O. Woody
Acting Senior Vice President - Nuclear

COW/JRH/cm

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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ATTACHMENT

RE: NRC Inspection Report 50-250, 251/89-14
ALARA Program Effectiveness Review

WEAKNESS NO. 1

Lack of Health Physics (HP) involvement in maintenance department mock-up training, lack of design-related ALARA training for design engineers, and minimal retraining or requalification for returning contract Health Physics technicians.

FPL response

- 1.a The ALARA Supervisor has reviewed the mock-up training program. Verbal recommendations have been provided to the Training Department on the use of protective clothing and respiratory protection equipment to ensure realistic mock-up scenarios. The Health Physics Department will provide written recommendations to the Training Department to improve mock-up utilization and Health Physics participation by June 30, 1989.
- 1.b Training for design engineers will take place in two phases. The initial phase will involve training of the two Nuclear Engineering ALARA coordinators (one for each FPL nuclear site). The coordinators' training will consist, in part, of completion of the Consumer Power Company's ALARA Engineering Technology (AET) course. AET is a 16 hour course which includes lecture, discussion, and case study analyses. The Engineering ALARA Coordinators will attend this course by the end of June, 1989.

Phase two will involve training of the Engineering Department. This training will include a transfer of general dose reduction knowledge gained by the Coordinators, as well as specific training on the Engineering ALARA Quality Instruction which is currently under development. In addition, advantage will be taken of additional outside training materials procured by the Health Physics Department to aid in design-related ALARA training. Issuance of the Engineering Quality Instruction and related training is anticipated to be completed during the first quarter of 1990.

- 1.c The Corporate Health Physicist has issued a Recommended Practice through the Senior Vice President-Nuclear. This document outlines initial and continuing qualification and training requirements for contract HP technicians. The Health Physics Department will implement the guidance contained in this Recommended Practice by revising O-ADM-360, "Radiation Protection Men Training Program", by September 1, 1989.



WEAKNESS NO. 2

Large percentage of the Radiation Control Area (RCA) maintained as contaminated.

FPL RESPONSE

Progress in reducing contamination within the RCA has been hampered due to numerous maintenance activities being performed during current extended outages for Unit 3 and 4. As these maintenance activities are completed, the percentage of contaminated area within the RCA will be reduced. Additional measures which were taken, or which are being considered, are outlined below.

Two mechanics have been assigned to the maintenance crew responsible for plant decontamination. This should provide for more timely identification and repair of small leaks in the RCA.

The maintenance crew responsible for plant decontamination now operates under daily direction of the HP Radwaste Supervisor. This working arrangement should provide more effective management of decontamination activities.

The use of advanced coatings (contamination resistant and strippable) for walls and floors in the RCA is under consideration.

WEAKNESS NO. 3

Poor work coordination and low man-hour estimates resulting in low dose projections.

FPL RESPONSE

The Health Physics Department is preparing a process description for use by all departments. This task will include process controls for use by department job planners and the ALARA Supervisor to continuously monitor the status of jobs (man-rem) against projections, and make documented adjustments to the projections. This process description will be presented to the ALARA Review Board by June 30, 1989.

The computer system currently in use by Health Physics to track exposure is not designed to compile man-hour data. A more advanced computer system is scheduled to be installed by June 1, 1990. This system will give the Health Physics Department the capability to report man-hours by Radiation Work Permit (RWP).



WEAKNESS NO. 4

Post-job ALARA review only conducted for jobs with a collective dose exceeding 50 person-rem..

FPL RESPONSE

The Corporate Health Physicist has recommended reducing the trigger level for post-job ALARA review to jobs exceeding 10 man-rem. Health Physics procedures will be revised to incorporate this change by September 1, 1989.

WEAKNESS NO. 5

Lack of formalization of the ALARA Zone Coordinator concept.

FPL RESPONSE

The Health Physics Department intends to utilize the ALARA Zone Coordinator concept for future scheduled outages. The function of and data reporting method to be followed by the ALARA Zone Coordinators is being prepared as a process description by the Health Physics Department. This process description will be presented to the ALARA Review Board by June 30, 1989.

WEAKNESS NO. 6

Lack of full attendance at the ALARA Coordinating Committee meetings.

FPL RESPONSE

The Health Physics Department is preparing a proposal to change the charter and reporting chain of the ALARA Coordinating Committee to improve its effectiveness. This proposal will be presented to the ALARA Review Board by June 30, 1989.

WEAKNESS NO. 7

Limitation of the suggestion program for ALARA improvements.

FPL RESPONSE

The Health Physics Department has instructed the Turkey Point Employee Suggestions ("Bright Ideas") Program Coordinator to direct suggestions for ALARA improvements to the ALARA Review Board for consideration.

FPL is continuing to review ways to allow contractor participation in the FPL Bright Ideas Program.

WEAKNESS NO. 8

Discrepancies in correlation of pocket ion chamber (PIC) and thermoluminescent dosimeter (TLD) measurements.

FPL RESPONSE

The correlation discrepancies are due to limitations in the computer program which requires resetting Direct Reading Dosimeters to zero prior to RCA entry. This problem will be corrected with the startup of the new Health Physics computer system which is scheduled for installation by June 1, 1990.

