

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9105290189 DOC. DATE: 91/05/20 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 AUTHOR AFFILIATION  
 GOLDBERG, J.H. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to ltr re violations noted in insp rept  
 50-250/91-08 & 50-251/91-08. Corrective actions: on-site  
 storage containers surveyed immediately & properly labeled &  
 plant procedure O-HPS-041 revised.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

MAY 20 1991

L-91-138  
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket No. 50-250 and 50-251  
Reply to Notice of Violation  
NRC Inspection Report 91-08

Florida Power and Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201, the required response is attached.

If there are any questions please contact us.

Very truly yours,

J. H. Goldberg  
President Nuclear Division

JHG/DPS/ds

Attachment

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

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PER. ADOCK 05000250  
Q FDR

U 00. an FPL Group company

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 91-08

FINDING

"Technical Specification 6.11.1 requires procedures for personnel radiation protection to be prepared consistent with the requirements of 10 CFR 20 and be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

10 CFR 20.203(f) requires, in part, each container of licensed material to bear a durable, clearly visible label identifying the radioactive contents. The label is to bear the radiation caution symbol and the words 'Caution, Radioactive Material,' and also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

Health Physics Surveillance Procedure O-HPS-041, Control of Radioactive Material Inside the Radiation Controlled Area, dated January 15, 1991, requires that containers with radiation levels equal to or greater than 1.5 millirem per hour (mrem/hr) on contact be labeled. This label shall indicate the radiation level, contamination or activity level, the type or kind of material, the name and phone number of the owner/user of the radioactive material, desired disposition of the material, date of label issue, and signature of the qualified RPM issuing the label.

Contrary to the above, on February 25-26, 1991, the licensee failed to follow procedures for labeling resin liners having contact dose rates exceeding 1.5 mrem/hr which were maintained in a storage area east of the Old Compactor Waste Building."

RESPONSE TO FINDING

1. FPL concurs with the finding.
2. This event was caused by non-cognitive personnel error by non-licensed plant personnel. The container labeling requirements of plant procedure O-HPS-041, "Control of Radioactive Material Inside the Radiation Controlled Area," were not met. Resin liners were stored in two of the three concrete "On-Site Storage Containers" observed by the NRC inspector. Because of the size of the concrete "containers" (10 feet tall, 8 feet diameter, 20 ton dry weight), FP&L



personnel were treating the "containers" as structures within the Radiation Control Area (RCA). Such structures inside the RCA are posted in accordance with station procedures, but do not require labels under 10 CFR 20.203(f).

One of the three containers was empty at the time of the inspection, therefore in accordance with the 10 CFR 20.203(f)(3)(iii), the 10 CFR 203 labeling requirements were not required for that "container." .

3 Corrective steps which have been taken and the results achieved:

- a. The on-site storage "containers" were surveyed immediately and properly labeled with a Radioactive Material Tag. This was completed by February 26, 1991.
- b. Other on-site storage containers were inspected to verify that they are properly labeled as required by the above regulation and plant procedure. No problems were found. This was completed by March 1, 1991.
- c. Plant procedure O-HPS-041, "Control of Radioactive Material Inside the Radiation Controlled Area," was reviewed and evaluated to ensure that the radioactive material labeling requirements in 10 CFR 20.203 (f) are clear and understandable. This was completed by March 1, 1991.
- d. Procedure O-HPS-041 was revised to note that the on site storage containers must be labeled.
- e. This event and the applicable requirements have been reviewed by applicable Health Physics Shift Supervisors and Technicians. This was completed by May 3, 1991.

4. Corrective actions which will be taken to avoid further violations include:

- a. The above corrective actions are deemed to be sufficient to preclude recurrence.

5. The date full compliance will be achieved:

Full compliance was achieved on February 26, 1991.

