



AUG 8 1985

L-85-306

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 2900  
Atlanta, Georgia 30303

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 250-85-017 and 251-85-017

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

We have also reviewed the comments in the report regarding usage of the NRC Branch Technical Position Paper concerning classification of radioactive waste required by 10 CFR 61.55. The comments include a position that the calculational methods described in the Branch Technical Position Paper are not applicable to our shipment. The basis for this position was stated to be the position paper's failure to specifically address calculations for mixtures of contaminated equipment and dewatered, unsolidified resin in the same package. FPL does not concur completely with this position. FPL submits that the Branch Technical Position Paper should be used for generic guidance where specific examples are not given. Based upon the generic guidance, the examples provided in the position paper, and the fact that both types of waste were well below the limit for Class A Waste, it is our position that our computations were a proper application of the guidance and consistent with practice throughout the industry. FPL concurs, however, that this methodology should not serve as a basis for reducing transportation requirements.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. W. Williams, Jr.", is written over a horizontal line.

J. W. Williams, Jr.  
Group Vice President  
Nuclear Energy Department

JWW/JA/ms  
Attachment

cc: Harold F. Reis, Esquire

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PDR ADCK 05000250  
Q PDR



## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket NO. 50-250, 50-251  
IE Inspection Report 250-85-017 and 251-85-017

### FINDING 1:

10 CFR 71.5 (a) requires that a licensee, who transports any licensed material outside the confines of his plant or other place of use or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) contained in 49 CFR Parts 170 through 189.

49 CFR 173.425 (b) requires that low specific activity (LSA) radioactive material consigned for exclusive use be packaged in a DOT Specification 7A Type A package or in a strong, tight package so that there will be no leakage of radioactive material under conditions normally incident to transportation.

Contrary to the above, on May 2, 1985, the licensee failed to package a shipment of LSA radioactive material in a DOT Specification 7A Type A package or a strong, tight package; and radioactive fluid leaked from a box containing LSA radioactive material during transport to a waste burial facility.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) Box No. 85-088B contained, in addition to dewatered unsolidified secondary condensate polishing resin, a flux wire mapper drive unit, which when separately evaluated would have been subject to the provisions of 10 CFR 71.5 (a) and 49 CFR 173.425 (b). Water was introduced into the shipping package with the secondary condensate polishing resin. The water inadvertently entered the resin hopper and during the transfer of the resin from the hopper to a LSA wooden shipping container, an inadequate assessment of the dryness of the material resulted in the formation of free standing water. The amount of free standing water was well within regulatory and burial site limits. However, the box leaked under conditions normally incident to transportation, and therefore did not satisfy the criteria for a strong tight package.
- 3) The following corrective actions were taken:
  - a) Upon notification of the incident, FPL dispatched the Turkey Point (Health Physics) Radioactive Waste Supervisor to the location where the shipment was leaking. The package was inspected and repaired and the shipment escorted to the St. Lucie Nuclear Power Plant. The shipment was inspected and released by the Florida Department of Health and Rehabilitative Services (DHRS) and then escorted back to Turkey Point.

Page 1

THE UNITED STATES OF AMERICA  
DOPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

Wash., D.C.

TO THE SECRETARY OF THE INTERIOR  
FROM THE DIRECTOR OF THE BUREAU OF LAND MANAGEMENT  
SUBJECT: [Illegible]

[Illegible text block]

[Illegible text block]

Very truly yours,

[Illegible signature]

[Illegible text block]

Very truly yours,

[Illegible text block]

Inspection Report 250-85-017 and 251-85-017

Page 2

- b) A portion of the water that leaked from the shipping container was collected and analyzed. The results indicated that the concentration of radioactivity was below 10 CFR 20 limits. Surveys by both FPL and DHRS found no measurable contamination on the package, truck or area where the leak was discovered.
  - c) Additional covers have been placed over the resin hoppers to prevent water intrusion.
  - d) Radioactive Waste Health Physics Technicians were counseled on the proper assessment of wet waste forms.
- 4) Use of LSA wooden shipping containers for this type of resin has been suspended. Future shipments of secondary system condensate polishing resin shipments will be made in a sealed steel container. The container will have the ability to be checked for free standing water and use of a sealed steel container will be incorporated into Operating Procedure (OP) 11550.48 (Health Physics Procedure, HP-48), "Process Control Program For Dewatering Radioactive Waste Liners" prior to the next shipment of secondary system condensate polishing resin.
- 5) Full compliance with item 3 above was achieved by July 19, 1985.

