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ACCESSION NBR:8912180016 DOC.DATE: 89/12/11 NOTARIZED: NO DOCKET #
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
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 HARRIS,K.N. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-017-00:on 890125,failure to maintain current
 inventory of radioactive matl due to inadequate procedures.
 W/8 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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L-89-448

10 CFR 50.73

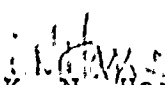
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Reportable Event: 89-17
Date of Event: January 25, 1989
Failure to Maintain a Current Inventory of Radioactive
Material Due to Inadequate Procedures

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very truly yours,


K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/MA/rat

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

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PDR ADOCK 05000250
S FDC

LICENSEE EVENT REPORT (LER)

| | | | | | | | | | | | | | | | | | | |
|--|------------|---|----------------|-------------------|-----------------|-------------------------|-----------------|------------|----------------------------|---|--|--|--|---|-----------------------------|------------------|--|--|
| FACILITY NAME (1) Turkey Point Unit 3 | | | | | | | | | | DOCKET NUMBER (2) 0 5 0 0 0 2 5 1 0 | | | | | PAGE (3) 1 OF 0 4 | | | |
| TITLE (4) Failure to Maintain A Current Inventory of Radioactive Material Due To Inadequate Procedures | | | | | | | | | | | | | | | | | | |
| EVENT DATE (5) | | | LER NUMBER (6) | | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | | | | | | | | |
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | MONTH | DAY | YEAR | FACILITY NAMES | | | | | DOCKET NUMBER(S) | | | | |
| | | | | | | | | | Turkey Point Unit 4 | | | | | 0 5 0 0 0 2 5 1 | | | | |
| 0 1 | 2 5 | 8 9 | 8 9 | 0 1 | 7 | 0 | 0 1 | 2 1 | 1 8 | 9 | | | | | | 0 5 0 0 0 | | |
| OPERATING MODE (9) | | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11) | | | | | | | | | | | | | | | | |
| 5 | | 20.402(b) | | | | 20.406(c) | | | | 50.73(a)(2)(iv) | | | | 73.71(b) | | | | |
| POWER LEVEL (10) | | 20.406(a)(1)(i) | | | | 50.36(c)(1) | | | | 50.73(a)(2)(v) | | | | 73.71(c) | | | | |
| 0 0 0 | | 20.406(a)(1)(ii) | | | | 50.36(c)(2) | | | | 50.73(a)(2)(vi) | | | | OTHER (Specify in Abstract below and in Text NRC Form 366A) | | | | |
| | | 20.406(a)(1)(iii) | | | | X 50.73(a)(2)(i) | | | | 50.73(a)(2)(vii)(A) | | | | | | | | |
| | | 20.406(a)(1)(iv) | | | | 50.73(a)(2)(ii) | | | | 50.73(a)(2)(vii)(B) | | | | | | | | |
| | | 20.406(a)(1)(v) | | | | 50.73(a)(2)(iii) | | | | 50.73(a)(2)(ix) | | | | | | | | |
| LICENSEE CONTACT FOR THIS LER (12) | | | | | | | | | | | | | | | | | | |
| NAME | | | | | | | | | | TELEPHONE NUMBER | | | | | | | | |
| David R. Powell, Regulation and Compliance Supervisor | | | | | | | | | | AREA CODE | | | | | | | | |
| | | | | | | | | | | 3 0 5 | | 2 4 6 1 - 6 5 5 9 | | | | | | |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) | | | | | | | | | | | | | | | | | | |
| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRC | | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRC | | | | | | | | |
| | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | |
| SUPPLEMENTAL REPORT EXPECTED (14) | | | | | | | | | | | | EXPECTED SUBMISSION DATE (15) | | MONTH | DAY | YEAR | | |
| <input type="checkbox"/> YES (If yes complete EXPECTED SUBMISSION DATE) | | | | | | | | | | | | <input checked="" type="checkbox"/> NO | | | | | | |

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On January 25, 1989, with Turkey Point Unit 3 in mode 5 (cold shutdown) and Unit 4 in mode 1 (power operation), a Quality Assurance (QA) audit identified where the inventory of radioactive materials required by Technical Specification (TS) 3.11.2, "Miscellaneous Radioactive Materials Sources," was not met. TS 3.11.2 requires a complete inventory of licensed radioactive materials in possession to be maintained current at all times. The inadequate inventory maintenance was caused by inadequate procedures. To correct these deficiencies, applicable procedures have been revised and new procedures have been issued. This LER was not submitted by February 24, 1989 as required by 10 CFR 50.73 due to non receipt of the QA audit by the Regulations and Compliance Group.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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|--|--|----------------|-------------------|-----------------|----------|----|-----|
| FACILITY NAME (1) Turkey Point Unit 3 | DOCKET NUMBER (2) 0 5 0 0 0 2 5 0 | LER NUMBER (6) | | | PAGE (3) | | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
| | | 8 9 | - 0 1 7 | - 0 0 | 0 2 | OF | 0 4 |

TEXT (If more space is required, use additional NRC Form 366A's) (17)

I DESCRIPTION OF EVENT

On January 25, 1989, with Turkey Point Unit 3 in mode 5 (cold shutdown) and Unit 4 operating at 100 percent power, a Quality Assurance (QA) audit identified an area of concern where Health Physics (HP) failed to meet Technical Specifications (TS) 3.11.2, "Miscellaneous Radioactive Materials Sources," requirements. TS 3.11.2 requires a complete inventory of licensed radioactive materials in possession to be maintained current at all times.

A. Inventory

During the QA audit, it was discovered that a complete and up to date inventory of radioactive materials at the site was not maintained. This was contrary to the requirements of TS 3.11.2. Sources mentioned in the audit consisted of liquid and gaseous materials used for sample analysis or instrument calibration, instrumentation containing sealed sources (i.e. radiochemistry's liquid scintillation counters) and sources containing less than one gram of special radioactive material.

B. Late Report

This report was not submitted within 30 days of discovery date (January 25, 1989) as required by 10 CFR 50.73(a).

II CAUSE OF EVENTA. Inventory

Violation of TS 3.11.2 was attributed to deficiencies in plant procedures 0-HPS-092, "Inventory Control and Leak Testing of Radioactive Sources," and AP 190.4, "Procurement Document Control." These deficiencies included inadequate materials purchase, receipt and issue controls as well as inadequate controls of inventory requirements for instrumentation containing sealed sources.

B. Late Report

The Regulations and Compliance Group (RCG) was verbally contacted by QA about the potentially reportable event and was awaiting receipt of the written report. Failure to receive the report resulted in the QA report not being reviewed for reportability in accordance with procedure AP 103.6, "Evaluation And Reporting Of In House Events." At the time, only written notification was considered "notification."

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO 3150-0104
EXPIRES 8/31/85

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) | | |
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| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
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| Turkey Point Unit 3 | 05000250 | 89 | 017 | 00 | 0 | 3 | OF 04 |

TEXT (If more space is required, use additional NRC Form 366A's) (17)

III ANALYSIS OF EVENT

A. Inventory

Turkey Point's failure to maintain a current inventory of licensed radioactive material on site in no way degraded the safe operation of the units. In addition, there are several radiation monitors located in key areas within the Protected Area (PA) which would detect any attempts made to remove radioactive materials from the PA. Some radioactive materials are maintained outside the PA. In the adjacent store's warehouse. Radioactive material kept there possess low activity. Administrative controls are in place at the warehouse to assure no unauthorized removal of sources occur. In the near future, as part of Turkey Point's Security Upgrade Program, the warehouse will be included within the PA.

IV CORRECTIVE ACTION

A. Inventory

This LER, 250-89-017-0, reports a finding of the January, 1989, QA audit of HP records for 1988. This finding showed that a complete and current inventory of radioactive sealed sources was not maintained. Corrective actions taken to prevent recurrence of this event include the creation of procedures 0-ADM-022, "Procuring of Radioactive Sources," and 0-ADM-023, "Inventory Control and Accounting of Radioactive Sources," and the revision of AP 190.4, "Procurement Document Control," to provide stricter material purchase, receipt and issue controls. These procedures also included additions to the inventory requirements to encompass applicable instrumentation containing sealed sources. In addition, nuclear chemistry procedure 0-NCSP-200.1, "Control of Chemistry Radioactive Sources," was developed to control how that group handles its inventory of radioactive sources. This procedure was implemented on August 10, 1989.

LER 250-89-012-0 reported a similar occurrence discovered on July 7, 1989, as a result of the June, 1989, semi-annual inventory of radioactive sources. In this event, the plant failed to leak test a source because it was not part of the radioactive materials inventory. This was due to failure to add a newly received source to the inventory in 1987.

Corrective actions taken as a result of the QA audit in January, 1989, were not completed until after the event reported in LER 250-89-012-0 took place. Therefore, corrective actions taken as a result of the QA audit in January, 1989, could not have precluded LER 250-89-012-0 from occurring.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) | | | | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | | | |
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| Turkey Point Unit 3 | 0 5 0 0 0 2 5 0 | 8 9 | - | 0 1 7 | - | 0 1 0 | 0 1 4 | OF | 0 4 |

TEXT (If more space is required, use additional NRC Form 365A's) (17)

B. Late Report

This event has been discussed with the applicable RCG engineers. Evaluations are now being performed upon receipt of verbal notification. Direct distribution of final QA audit reports to RCG will ensure that followup written notifications are being performed in accordance with AP 103.6.

V ADDITIONAL INFORMATION

Similar occurrences: LER 250 89-012-0