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 HARRIS,K.N. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-021-00:on 890721,violation of Tech Spec 3.9.3(a) due to utilization of HIC not authorized in PCP.

W/9 ltr.

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FPL

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

MAY 18 1990

L-90-187
10 CFR 50.73

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
Reportable Event: 89-021-00
Date of Event: July 21, 1989
Violation of Technical Specification 3.9.3 (a) Due to
Utilization of a High Integrity Container (HIC) not Authorized
in the Process Control Program (PCP)

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

Very truly yours,

K. N. Harris
K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/DRP/DWH/rat

attachment

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

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 2 5 0				PAGE (3) 1 OF 0 3		
TITLE (4) Violation of Technical Specification 3.9.3(a) Due to Utilization of a High Integrity Container (HIC) Not Authorized In The Process Control Program (PCP)																
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)			
0 7	2 1	8 9	8 9	0 2 1	0 0	0 5	1 8	9 0	Turkey Point Unit 4				0 5 0 0 0 2 5 1			
OPERATING MODE (9) 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)													
POWER LEVEL (10) 1 0 0		20.402(b)				20.406(a)				50.73(a)(2)(iv)				73.71(b)		
		20.406(a)(1)(i)				50.36(a)(1)				50.73(a)(2)(v)				73.71(c)		
		20.406(a)(1)(ii)				50.36(a)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 368A)		
		20.406(a)(1)(iii)				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)(viii)(B)						
		20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)						
LICENSEE CONTACT FOR THIS LER (12)																
NAME David R. Powell, Licensing Superintendent										TELEPHONE NUMBER						
										AREA CODE 3 0 5 2 4 6 - 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 July 21, 1989, with Unit 3 in Mode 1 (Power Operation) at 100 percent power and Unit 4 in Mode 3 (Hot Standby), discrepancies in the Turkey Point Process Control Program (PCP) were identified. A Site Quality Assurance audit revealed that seven radioactive waste resin shipments were made in 1988 using a High Integrity container (HIC) that was not included in the list of authorized HICs in the PCP. This condition was initially evaluated and determined to be procedural in nature. The dewatering, shipping, and transportation requirements of Technical Specification (TS) 3.9.3(a) were met. The condition was determined to be a violation of administrative TS 6.17 and not reportable under 10CFR50.73. On May 4, 1990, FPL reversed this position and determined the condition to be reportable. The cause for the PCP discrepancies was inadequate procurement practices for purchasing radioactive disposal containers. Vendors were not required to notify FPL of changes to their equipment or processes that could affect the validity of the PCP. A Purchase Order (PO) for waste packaging, transportation, and disposal services was awarded to the Westinghouse Electric Corp. on July 25, 1989. This PO was revised on August 24, 1989 to include a requirement that FPL be notified of any changes to equipment or processes being provided.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

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

DESCRIPTION OF THE EVENT

On July 21, 1989, with Unit 3 in Mode 1 (Power Operation) at 100 percent power and Unit 4 in Mode 3 (Hot Standby), discrepancies in the Turkey Point Process Control Program (PCP) (EIIIS: WB) were identified. A Site Quality Assurance audit revealed that seven (7) radioactive waste resin shipments were made in 1988 using a Model PL6-80FR High Integrity Container (HIC) that was not included in the list of authorized HICs in the PCP.

The discrepancies were initially evaluated and determined to be procedural in nature. The dewatering, shipping and transportation requirements of Technical Specification 3.9.3(a), "Radioactive Resin Beads," were met. Use of a HIC that was not included in the list of authorized HICs in the PCP was believed to be a violation of administrative Technical Specification 6.17, "Process Control Program," and therefore, not reportable under 10CFR50.73 criteria.

During a NRC inspection conducted at the Turkey Point Nuclear site April 30, 1990 to May 4, 1990, the previously identified use of a HIC not included in the list of authorized HICs in the PCP was revisited. Since the Semi-Annual Effluent Release Reports for the time periods affected had to be revised to reflect additional solid waste activities, the transportation requirements of Technical Specification 3.9.3(a) were not met. Therefore, FPL determined that a Licensee Event Report is required.

CAUSE OF THE EVENT

In 1986, Chem-Nuclear Systems, Inc. (CNSI) was awarded a contract to provide radioactive waste packaging, transportation, and disposal services for the Turkey Point Nuclear site. The purchase order specifications required the vendor to provide equipment and materials necessary to package, transport, and dispose of radioactive resin beads, among other types of waste. The document did not specify that the containers used for packaging radioactive waste must be among those listed in the PCP.

In 1987, CNSI began to manufacture the Model PL6-80 sized HIC with flat bottoms instead of conical bottoms. At this time, the model designation was changed from PL6-80CR to PL6-80FR. The procurement practices for purchasing radioactive waste disposal containers included in the list of authorized containers in the PCP did not require vendors to inform FPL of changes to their equipment or processes that could affect the validity of the PCP. Additionally, a program did not exist at FPL to verify that the containers ordered and received were included in the list of authorized containers in the PCP. These two deficiencies resulted in the requirements of Technical Specification 3.9.3(a) not being met.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

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

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 2 1	0 0	0 3	OF	0 3

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

ANALYSIS OF THE EVENT

On June 15, 1987, the South Carolina Department of Health and Environmental Control (DHEC), Bureau of Radiological Health, issued an amendment to DHEC-HIC-PL-001, Certificate of Compliance for HICs, to allow CNSI to incorporate drawings for flat bottomed HICs. The conditions and requirements that must be met for acceptance of conical bottomed HICs and flat bottomed HICs by DHEC are identical. Although the use of flat bottomed HICs resulted in an increase in the resin volume and curie content above that documented on the manifest, the waste classification remained the same, and the transportation and burial requirements were unchanged. The health and safety of the public and the environment were not affected.

CORRECTIVE ACTIONS

1. A Purchase Order (PO) for waste packaging, transportation, and disposal services was awarded to the Westinghouse Electric Corp. on July 25, 1989. This PO was revised on August 24, 1989 to include a requirement that FPL be notified of any changes to equipment or processes being provided.
2. Operating Procedure (OP) 11550.48, "Process Control Program for Dewatering Radioactive Waste Liners," was revised on February 13, 1990. This revision identifies the types of radioactive waste that require High Integrity Containers for which Certificates of Compliance have been issued by the South Carolina DHEC.
3. Manifests were revised for the radioactive waste resin shipments made in 1988 which used a HIC not included in the list of authorized HICs in the PCP. The revised manifests were transmitted to CNSI and the Florida Department of Health and Rehabilitative Services on August 17, 1989 and November 1, 1989, respectively.
4. The Semi-Annual Radioactive Effluent Release Reports for the affected time periods were revised on April 9, 1990 to include the additional solid waste activities.

ADDITIONAL INFORMATION

No similar Licensee Event Reports have been issued for the Turkey Point Nuclear Plant.

