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ACCESSION NBR:9209240370 DOC.DATE: 92/09/15 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  
 GOLBERG,J.H. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to violations noted in Insp Repts  
 50-250/92-16 & 50-251/92-16. Corrective actions: area of spill  
 in radwaste bldg barricaded to prevent radioactive water  
 leaking out of bldg. Barricade successfully contained spill.

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NOTES: NRR RAGHAVAN, L 05000250 /  
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NOTES: 1 1

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L-92-243  
10 CFR 2.201

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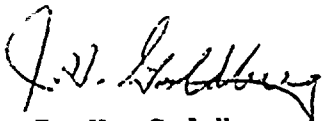
Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket No. 50-250 and 50-251  
Reply to Notice of Violation  
NRC Inspection Report 92-16

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/JEK/jk

Attachment

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

21:204

9209240370 920915  
PDR ADDCK 05000250  
Q PDR

*JEK*

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 92-16

FINDING:

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Paragraph 7 of Regulatory Guide 1.33, Appendix A, Revision 2, February 1978, recommends that implementing procedures be written for the control of radioactivity for limiting materials released to the environment and for limiting personnel exposure. Item b(1) of this paragraph specifies the need for procedures pertaining to the solid waste system including the handling of spent resins and filter sludge.

Paragraph 8.1.2.13 of procedure 0-HPS-042.5, Transfer and Dewatering Bead Resin in RADLOK High Integrity Containers, requires that the flush line be connected to the fill/divert valve and routed to the secondary high integrity container (HIC). Paragraph 8.1.2.14 of this procedure requires that the open end of the flush line be connected to the standpipe on the fill container of the secondary HIC.

Contrary to the above, on July 9, 1992, procedure 0-HPS-042.5 was not followed in that one end of the flush line was connected to the fill/divert valve; and an open end of a second identical hose, which was loosely coiled on the floor with the remainder of the flush line, was connected to the secondary HIC leaving the open end of the flush line from the fill/divert valve unterminated. As a result, approximately one cubic foot of residual spent resin and 100 to 250 gallons of flush water leaked onto the floor of the south cask room. The drainage troughs overflowed resulting in the contamination of approximately 4,500 square feet of floor space in the radwaste building.

This is a Severity Level IV violation (Supplement IV).



RESPONSE TO FINDING

1. FPL concurs with the finding.
2. Cause of the violation:

The resin transfer evolution of July 9, 1992, was performed in accordance with plant procedure 0-HPS-042.5, Transfer and Dewatering Bead Resin in RADLOK High Integrity Containers, and vendor procedure OM-049-WS, Operating Procedure for Pacific Nuclear/Waste Services Group Resin Drying (Dewatering) System at Florida Power and Light Company - Turkey Point. Procedure 0-HPS-042.5 has two steps which control the connection of hoses for the flushing of waste transfer hoses after completion of a resin transfer. While the letter of these steps were followed, their intent was not met. The spill was caused by personnel error in that two identical hoses were on the floor with one connected by only one end to the fill/divert valve and one connected by only one end to the flush container fill head. The two separate hoses, loosely coiled together on the floor, appeared to be a single hose. One end of each hose was connected as required by the procedure. While procedure 0-HPS-042.5 was followed verbatim, the operators did not verify the continuity of the hose for its entire length from the fill/divert valve to the flush container fill head.

3. Corrective steps which have been taken and the results achieved:
  - a. The area of the spill in the Radwaste Building was barricaded to prevent radioactive water from leaking out of the building. The barricade successfully contained the spill.
  - b. A spill barrier was erected at the truck bay door to prevent the spill from reaching the environment. The spill did not breach the truck door barrier.
  - c. Plant personnel recovered the contaminated area in the Radwaste Building.
  - d. A temporary, reusable storm drain cover was placed over the storm drain at the entrance to the truck bay. The cover was not challenged since the spill was contained by the barricade around the spill area as discussed in 3.a., above.
  - e. Primary resin transfers to waste containers were suspended until the investigation and appropriate corrective steps were complete.
4. The corrective steps to be taken to avoid further violations:
  - a. Vendor procedure OM-049-WS will no longer be used for resin transfers at Turkey Point Nuclear. Vendor procedure OM-049-WS will be replaced by a revision to plant procedure 0-HPS-

042.5, prior to the next resin transfer. The revision to plant procedure 0-HPS-042.5 will include the following requirements.

- 1) Temporary hoses used for waste transfers are to be color-coded and uniquely identified with tags on each end that indicate the component to which that end of the hose is to be attached. Identical tags will be used to identify the system component to which the hose is to be attached.
- 2) Step by step sign-offs and independent verifications will be completed at pertinent steps for equipment setup and operation.
- 3) A procedural step requiring that a spill barrier be in place at the truck bay door, and a drain cover be placed over the storm drain, prior to transferring primary water, or spent resin, to the waste containers was developed.
- 4) Steps requiring verification of waste flow paths with primary waste water before transferring resin will be included.

The procedure will be walked down by Turkey Point personnel and vendor personnel prior to initial use.

- b. Individuals that made and verified the improper connections were counselled as to the importance of the confirmation of the correct flow path.

5. The date when full compliance was achieved:

Full compliance with the procedure and the completion of the resin transfer occurred on July 9, 1992.

