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 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 R
 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violation noted in insp repts 50-250/94-04 &
 50-251/94-04. Corrective actions: vendor-supplied training
 provided to members of plant Chemistry staff.

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JUN 2 1994

L-94-135
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Units 3 & 4
Docket No. 50-250/251
Reply to Notice of Violation
NRC Inspection Report 94-04

Florida Power & 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/CLM/cm

Attachment

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

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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 94-04

FINDING:

Technical Specification (TS) 6.4.1 requires a retraining and replacement training program for the facility staff to be maintained under the direction of the Training Manager, and to meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971, 10 CFR Part 55 and ANSI 3.1, 1981, and to include familiarization with relevant industry operational experience. Section 5.5 of both ANSI 18.1-1971 and ANSI 3.8-1981 specify that training programs be established which maintain staff proficiency.

Contrary to the above, as of March 4, 1994, the licensee's specialized retraining program was inadequate in maintaining staff proficiency in that responsible chemistry personnel were not trained adequately regarding operation of the liquid scintillation counting system. Proficiency shortcomings were demonstrated by staff failure to describe properly efficiency calibration methods and quench and radioactive decay corrections used for the automatic analysis protocol established for the analytical tritium (H-3) measurements.

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



RESPONSE TO FINDING

1. Florida Power & Light Company (FPL) concurs with the finding.

2. Reason for the violation:

The root cause for failure to provide and maintain specialized training for the liquid scintillation counting equipment is that subject matter expert training was not identified in the Chemistry Training program.

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

Vendor-supplied training was provided to members of the Turkey Point Nuclear Plant Chemistry staff. A basic overview was provided to fourteen persons. Of the fourteen, eight received training on the Packard Scintillator. This training covered theory, operation, setup, and a detailed review of the analysis, operating protocols, calibration methods, and quench and decay corrections.

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

Subject matter experts for the liquid scintillation counting system will be incorporated into the chemistry training qualification matrix. This matrix is forwarded to the Chemistry Supervisor monthly for his review, to determine if a need for additional training is indicated. This action will be complete by June 30, 1994.

In addition, FPL is identifying subject matter experts for other selected chemistry instrumentation. As they are identified, their qualifications as the subject matter expert will be verified, and they will be added to the chemistry training qualification matrix.

5. The date when full compliance was or will be achieved:

Full compliance was achieved on May 24, 1994, when training of responsible chemistry personnel was completed regarding operation of the liquid scintillation counting system.