

**Florida  
Power**  
CORPORATION

18 June 1979  
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CS-79-184

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Mr. J. P. O'Reilly, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
101 Marietta St., Suite 3100  
Atlanta, GA 30303

Docket No. 50-302  
License No. DPR-72  
Ref: RII:RWZ  
50-302/79-15

Dear Mr. O'Reilly:

We offer the following responses to the apparent Items of Noncompliance in the referenced inspection report.

NOTICE OF VIOLATION

- A. As required by Technical Specification 6.11 "Procedures for Personnel Radiation Protection shall be prepared consistent with the requirements of 10 CFR Part 20." Further, 10 CFR 20.203(f) requires that "each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents; and further, the required label "shall bear the radiation caution symbol and the words "CAUTION, RADIOACTIVE MATERIAL", or "DANGER, RADIOACTIVE MATERIAL". It shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures."

Contrary to the above, on May 11, 1979, no procedures were available or prepared which address the concerns of 10 CFR 20.203(f).

- A. Response: A procedure titled "Radioactive Material Tagging, RP-217" has been prepared to address those requirements specified in 10 CFR 20.203(f) and is currently in the review cycle. The developed and approved procedure will be implemented and adhered-to for all radioactive material placed in storage. Additionally, material already in storage will be surveyed, packaged, and tagged, in accordance with RP-217.

Full compliance will be achieved by 1 September 1979.

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- B. As required by 10 CFR 71.12.b.ii, the licensee must comply "with the terms of the ...certificate" of compliance and further, Condition 5.b of the certificate of compliance #9081, dated June 5, 1978, limits the contents of the cask to either "solid metals" or "neutron sources in special form".

Contrary to the above, on March 21, 1979, the licensee made a shipment numbered 79-21 #1 and #2, of spent reactor coolant letdown prefilters and sludge containing 276 curies and 92 curies respectively in shipping cask bearing a certificate of compliance #9081.

- B. Response: CNSI, 1600 cask (Certificate of Compliance #9081) will no longer be utilized for waste shipments other than "solid metals or neutron sources in special form" until it can be re-evaluated for other waste shipments. Revisions to RP-209, Radioactive Waste Shipment Documents, are being implemented to reflect the use and compliance with issued cask certificates of compliance.


All changes will be implemented and full compliance achieved by 1 October 1979.

Should there be further questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION

  
Nuclear Plant Manager

  
W. P. Stewart  
Manager, Nuclear Operations

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