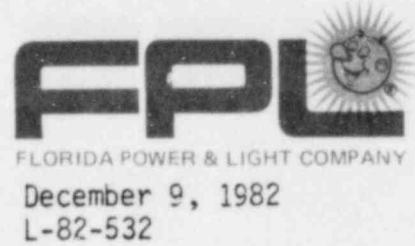


REC REGION
ATLANTA, GEORGIA
DEC 13 1982 AID: 13



Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Docket Nos. 50-335
IE Inspection Report 82-33

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire

Re: St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 82-33

Finding A

10 CFR 20.201(b) requires licensees to make or cause to be made such surveys as may be necessary to comply with the regulations in 10 CFR 20. A survey as defined in 20.201(a) is an evaluation of the radiation hazards under a specific set of conditions. 10 CFR 20.301 states that no licensee shall dispose of licensed material except: (a) by transfer to an authorized recipient; (b) as authorized pursuant to 10 CFR 20.302; or (c) as provided in 10 CFR 20.303 (disposal by release into sanitary sewage systems) or 10 CFR 20.106 (radioactivity in effluents to unrestricted areas). 10 CFR 20.302 states that a licensee may apply to the Commission for approval of proposed procedures to dispose of licensed material in a manner not otherwise authorized in the regulations.

Contrary to the above, surveys or evaluations of the radioactivity in the sanitary sewage treatment system were not performed adequately to assure compliance with the waste disposal criteria specified in 10 CFR 20.301 in that on January 8, 1982, and June 22, 1982, sludge from the sanitary sewage treatment facility containing licensed material (principally Cobalt-60) was disposed of in a manner not authorized in the regulations and without prior Commission approval.

1. FPL concurs with the findings.
2. The finding was a result of an oversight concerning the routing of the sink drainage. See LER 335-82-45 for additional details.
3. As corrective action, the sink drainage was rerouted to the proper radioactive waste system. The radioactive sludge and dirt were removed from the dump site and will be disposed as Low Specific Activity (LSA) radioactive waste.
4. As corrective action to avoid further problems, all potential drain pathways in the RCA have been reviewed and traced. All toilets and urinals in the RCA which could possibly receive radioactive material have also been blocked. All future construction of a liquid system in the RCA will be reviewed according to I&E Bul. 80-10.
5. Full compliance has been achieved as of this date.

Finding B

10 CFR 20.203(e) requires that each area in which licensed material is used or stored and which contains any radioactive material in an amount exceeding ten times the quantity of such material specified in Appendix C of this part shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "Caution (or Danger) Radioactive Materials."

Contrary to the above, a radioactive materials area was not properly posted in that on September 23, 1982, the sanitary sewage treatment plant containing greater than 10 microcuries of Cobalt-60 was not posted a radioactive materials area.

1. FPL concurs with the finding.
2. The finding was due to an oversight concerning posting of the sanitary sewage treatment plant.
3. As corrective action, the sewer treatment tanks are posted as a radioactive materials area and will remain so until clean-up operations are complete and less than 10 microcurie of total activity are present in the tanks.
4. As corrective action to prevent further findings, the personnel involved were made aware of the posting instructions as directed in Health Physics procedure HP-20.
5. Full compliance has been achieved as of this date.

Finding C

Section 9.2.3 of the FSAR states that the sanitary water system will not act as a radiological contamination source. Section 9.3.3.1 of the FSAR states that wastes from radioactive drains will be collected for sampling, analysis and processing as required, to assure that releases to the environment are in accordance with the limits established by 10 CFR 20.

Contrary to the above, the sanitary waste system was connected to a radioactively contaminated source. A sink used for respirator decontamination, two potentially contaminated toilets, and a potentially contaminated urinal drain were connected to the sanitary sewage treatment plant. Radioactivity from these sources were concentrated by the treatment system and were neither monitored nor sampled prior to disposal to assure compliance with 10 CFR 20 limits.

1. Water samples for the sanitary waste have been routinely sampled in the past. As corrective action, this sampling shall continue in the future. In addition, before disposal of solids, sampling shall be required and documented.
2. As corrective action to prevent future problems of this type the samples discussed above will be continued.
3. Full compliance has been achieved as of this date.