

USNRC REGION II
ATLANTA, GEORGIA



83 JUN 3 P8:56

June 1, 1983
L-83-337

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: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Proposed Civil Penalty: EA 83-31
IE Inspection Report 83-06

Florida Power & Light has reviewed the proposed civil penalty and associated inspection report and a response is attached.

Also attached are additional comments concerning information provided with the civil penalty letter.

In accordance with your letter a check for the full amount of the penalty is enclosed.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig". The signature is fluid and cursive, with the first name "Robert" and last name "Uhrig" clearly distinguishable.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire

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PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 & 4
DOCKET NOS. 50-250, 50-251
PROPOSED CIVIL PENALTY EA 83-31
IE INSPECTION REPORT 83-06

FINDING:

10 CFR 20.201 requires a licensee to make such surveys as (1) may be necessary for the licensee to comply with the requirements of 10 CFR 20, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, the licensee did not perform such surveys as were reasonable under the circumstances of nonuniform radiation fields encountered in steam generator repair, to evaluate the extent of the resultant radiation hazards. Specifically, the surveys were inadequate to ensure that the occupational dose limits of 10 CFR 20.101 would not have been exceeded in the following instances:

1. On February 1 and 2, 1983, an individual's self-reading dosimeter was found to be off-scale. No evaluation was conducted to determine this individual's actual dose on either occasion.
2. During the month of February 1983, eleven individuals performed work in a high radiation area. Although surveys were made to determine the actual radiation hazards present, the workers were not instructed to wear their personnel dosimeters on a body location that would provide the licensee with valid measurements of their whole body doses.

RESPONSE:

To Finding 1:

1. Florida Power & Light concurs with the finding.
2. The evaluation was not conducted because the individual failed to comply with instructions given during his Health Physics (H.P.) training course and failed to follow specific verbal H.P. instructions when his self-reading dosimeter (SRD) was found to be off-scale.
3. As interim immediate corrective action, the following actions were taken:
 - A. Prior to the NRC having knowledge of the finding, the policy on off-scale SRDs was changed so that instead of being directed by H.P. to report to the H.P. Shift Supervisor, every individual with an off-scale SRD would be physically escorted to the H.P. Shift Supervisor. The evaluation would then be initiated.

- B. The policy on off-scale SRDs was further changed so that whenever an individual's SRD was found off-scale, his TLD would be read out before he could reenter the radiation controlled area.

These actions remained in force throughout the remainder of the Unit 4 steam generator repair outage. These actions prevented any recurrence of the finding.

A thorough evaluation was conducted by plant and Corporate Health Physics personnel on the subject individual and a conservative dose was assigned for the time period in question. The resulting accumulated dose remained below 10 CFR 20.101 limits.

- 4. As corrective action to preclude further findings, the following has been done:
 - A. Operating Instructions have been revised specifying detailed duties during outage and non-outage conditions for control point technicians.
 - B. All off-scale SRD evaluations now require H.P. Shift Supervisor approval prior to allowing an individual back into the controlled area.
 - C. Health Physics technicians have been trained on the revised instructions as of May 27, 1983.
- 5. Full compliance was achieved by May 27, 1983.

To Finding 2:

- 1. Florida Power & Light concurs with the finding.
- 2. The finding occurred because some of the job requirements for certain brief evolutions in the steam generator channel head were not properly anticipated.
- 3. The immediate corrective actions taken consisted of:
 - A. Identifying the personnel who entered the unshielded steam generator channel head and placing restrictions on their allowable administrative exposure limits to insure adequate exposure controls pending the outcome of the investigation.
 - B. The H.P. Department conducted interviews and investigations concerning all channel head activities performed during the time in question. These actions helped to determine the cause of the higher exposures.
 - C. An ALARA engineer was assigned to coordinate all steam generator activities for the remainder of the Unit 4 steam generator repair outage and multiple dosimetry was established for all unshielded steam generator entries.

These actions enabled us to properly anticipate future job requirements and to assure that all personnel were properly monitored for the rest of the Unit 4 steam generator repair project.

4. Corrective measures to avoid further problems consisted of:

- A. Corporate criteria for proper dosimetry placement has been established.
- B. Administrative Procedure 11550.6, ALARA Program, was revised to incorporate an ALARA dosimetry evaluation.
- C. The plant Health Physics staff will complete formal training in the above corporate guidelines by June 30, 1983.
- D. As determined by the ALARA dosimetry evaluation, the personnel dosimetry requirements will be referenced on the radiation work permit.

5. Full compliance will be achieved by June 30, 1983.

ATTACHMENT 2

Pursuant to provisions of 10 CFR 2.205, we would like to comment on the following statements appearing in the Notice of Violation and letter to Dr. R. E. Uhrig from James P. O'Reilly dated May 3, 1983, respectively:

- A. Second sentence, first paragraph on page one of Notice of Violation and Proposed Imposition of Civil Penalty states, "Because of inadequate procedural controls, the worker's dose resulting from exposure received in the high radiation area of the containment was not evaluated as required by NRC Regulations." In fact, for the duration of the two off-scale dosimeter events, our investigation showed that the individual involved was working in a radiation area inside Unit 4 containment.
- B. Page 1, second paragraph, second sentence of letter from J. P. O'Reilly to Dr. R. E. Uhrig, proposed civil penalty: EA 83-31, states, "A subsequent evaluation, performed by the staff of your facility when the matter was brought to their attention by an NRC Inspector, revealed that one or more workers could have exceeded the dose limits of 10 CFR 20 had the inspector not intervened." In fact, the subsequent evaluation performed by the Health Physics Department has determined that a violation of 10 CFR 20 would not have occurred due to the normal health physics controls imposed on the workers (i.e., administrative exposure limits), availability of additional qualified inspectors and the brief duration that this specific work was actually performed while the steam generators were unshielded.

Also, pursuant to 10 CFR 2.205 we would like to address the following extenuating circumstances with regard to the missing evaluations for the off-scale self-reading dosimeters:

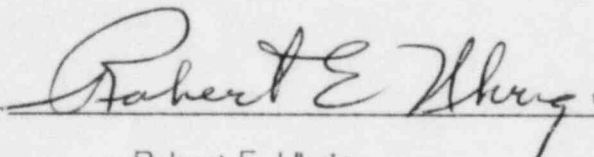
- A. We identified the missing evaluations for the two off-scale events.
- B. We took immediate corrective measures upon discovery of missing evaluations to prevent recurrence.
- C. We reported the situation concerning the missing evaluations to the Region II Office and our assigned H.P. Inspector in a timely manner.
- D. All personnel working in radiation controlled areas had been specifically instructed during H.P. training on the action to be taken should they have an off-scale self-reading dosimeter.

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

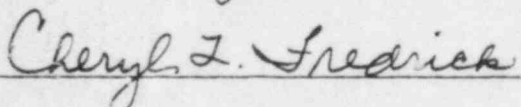
That he is Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

1 day of June, 1983.



NOTARY PUBLIC, in and for the County
of Palm Beach, State of Florida.

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency

DCJ

BILL FOR COLLECTION

Bill No. _____

U. S. Nuclear Regulatory Commission

Date 6/6/83

(Department or Establishment and Bureau or Office)

Washington, DC 20555

(Address)

PAYER:

Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408

*This bill should be returned by the
payer with his remittance.*

SEE INSTRUCTIONS BELOW.

Date	DESCRIPTION	Quantity	Unit Price		Amount	
			Cost	Per		
6/6/83	Full payment for CP dated 5/3/83, docket nos. 50-250 & 50-251, EA 83-31.				\$40,000.00	
AMOUNT DUE THIS BILL.					\$40,000.00	

This is not a receipt

INSTRUCTIONS

Tender of payment of the above bill may be made in cash, United States postal money order, express money order, bank draft, or check, to the office indicated. Such tender, when in any other form than cash, should be drawn to the order of the Department or Establishment and Bureau or Office indicated above.

Receipts will be issued in all cases where "cash" is received, and only upon request when remittance is in any other form. If tender of payment of this bill is other than cash or United States postal money order, the receipt shall not become an acquittance until such tender has been cleared and the amount received by the Department or Establishment and Bureau or Office indicated above.

Failure to receive a receipt for a cash payment should be promptly reported by the payer to the chief administrative officer of the bureau or agency mentioned above.

IE-14

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FLORIDA POWER & LIGHT CO.

40,000.00

TO THE ORDER OF

U. S. Nuclear Regulatory Commission

FLORIDA POWER & LIGHT COMPANY / MIAMI, FLORIDA

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SOUTHEAST BANK, N.A.
MIAMI, FLORIDA 33131

#06767 #1063107380# -- -- 10742022E

REMITTANCE ADVICE - TEAR OFF BEFORE DEPOSITING - NO RECEIPT REQUIRED

IN FULL SETTLEMENT OF THE FOLLOWING INVOICES

DATE	INVOICE OR LIST NO.	AMOUNT	DATE	INVOICE OR LIST NO.	AMOUNT
	5 2267	\$ 40,000.00			

96

FLC LIDA POWER & LIGHT COMPANY / MIAMI, FLORIDA