

USNRC REGION II
ATLANTA, GEORGIA

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September 13, 1983
L-83-485

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Inspection Report 83-18

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/cab

Attachment

cc: Harold F. Reis, Esquire

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Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
INSPECTION REPORT 83-18

FINDING:

- A. 10 CFR 20.201(b) requires the licensee to perform surveys as necessary to demonstrate compliance with 10 CFR 20.106 which limits the release of radioactivity in unrestricted areas to concentrations in Appendix B, Table II.

Contrary to the above, failure to properly implement and review calibration data for the gamma spectroscopy systems resulted in the use of an improperly calibrated detector for the measurement of radioactive effluents released to unrestricted areas. This failure resulted in an overstatement of the amount of radioactivity released to the environment.

RESPONSE:

1. FPL concurs with the finding. As discussed below, we do not feel the finding is appropriately classified with respect to its severity level.
2. We identified the need for re-calibration of 2 Ge-Li detectors after factory service had been performed on them. However, the NBS calibration gas which we had available had become depleted in Xe-133 (81 Kev Gamma) and new calibration gas would not be available for several months. The new calibration was performed including an approximate value for 81 KeV based on reviewing previous gas calibration curves and attempting to select a value which would be conservative.
3. The efficiency value for 81 KeV was corrected during the inspection based on the cross calibration results between the NRC and FPL. Our new efficiency values would result in answers similar to that of the NRC.
4. Subsequent gas calibration results will be compared more closely and in a more timely manner with prior gas calibration results. Another source of NBS traceable calibration gases will be searched out. When appropriate, cross checks will be performed between the Nuclear Chemistry and Health Physics counting equipment.
5. New gas calibrations were begun in August and are continuing with fresh NBS calibration gases and, therefore, full compliance was achieved prior to August 31, 1983.

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Addendum:

We feel the severity level of the violation should be reduced from IV to V. The definition of severity Level IV refers to "Any other matter that has more than minor safety or environmental significance". As was stated in the inspection report, the result of this finding was an overstatement of the amount of activity released. Furthermore, we feel it was for all practical purposes impossible to have overestimated our detector efficiency (i.e., which would be necessary before the error would result in understatement of release activity) because historically we have been approximately 20% to 40% high on our reporting of Xe-133 (81 KeV) activity and, as was stated in No. 2 above, a deliberate attempt was made to select an efficiency value which would result in a conservative reporting of Xe-133.

FINDING:

- B. Technical Specification 6.8.1 requires written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Appendix "A" of USNRC Regulatory Guide 1.33. Appendix A of Regulatory Guide 1.33 requires chemical and radiochemical control procedures including instructions for operation and calibration of equipment.

Technical Specification 6.8.1c requires temporary changes to procedures of 6.8.1 to be made provided the change is documented, reviewed by the PNSC and approved by the Plant Manager - Nuclear within fourteen days of implementation.

Contrary to the above, the licensee failed to make changes to operating procedures for equipment modifications made to a gas flow proportional counting system on March 3, 1983. This modified equipment was in continuous use for surveillance activities from March 3 to April 18, 1983.

RESPONSE:

1. We do not concur with the finding, for the following reasons:

Nuclear Chemistry Procedure NC-13, Gas Flow Proportional Counter Efficiency Check, gives a usual relative efficiency range. If the source count does not give results within this range, the procedure then calls for an investigation of the reasons for the out-of-usual-range results. When the "equipment modification" (a window) was added to the counter, the efficiency of the counter naturally dropped. The new efficiency value fell within the range expected based on previous experience with gas flow counters with windows attached. The efficiency value was reproducible. Based on the procedure requirement to investigate the reasons for changes in efficiency, we felt we had satisfied the requirements of the procedure and were justified in using the counter without a procedure change. There was also no impact on results obtained from the counter because sample counts and analyses were also made using the new efficiency.