



USNRC REGION II
ATLANTA, GEORGIA

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**Florida
Power**
CORPORATION

October 19, 1983
3F-1083-16

Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 83-24

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report. Should there be any questions concerning this information, please contact this office.

Sincerely,

G.R. Westafer
Manager
Nuclear Operations Licensing and Fuel Management

Attachment

AEF:feb

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PDR ADOCK 05000302
Q PDR

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OCTOBER 19, 1983

VIOLATION

10 CFR 71.5 requires that no licensee shall deliver licensed material to a carrier for transport unless the licensee complies with the applicable 40 CFR 170-189 requirements. 49 CFR 170.203(d)(iii) requires that the description for a shipment of radioactive material must include the activity contained in each package of the shipment in terms of curies, millicuries, or microcuries.

Contrary to the above, the licensee failed to accurately describe on the shipping paper the total quantity of radioactive material contained in a package in that the licensee did not consider or include the fixed contamination on a plenum stand for determining the activity contained in a package that was delivered for transport and shipped to another licensee on February 28, 1983 as a hazardous material.

Severity Level V

RESPONSE

(1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporation (FPC) agrees with the stated violation in that the method used to determine the total activity of the package shipped on February 28, 1983 could have allowed hazardous material to be transported with incorrect shipping papers contrary to the requirement of 49 CFR 172.203(d)(iii).

FPC compared the initial results with those calculated using the Department of Transportation (DOT) recommended method of estimating the total activity from the removable contamination (31216 FR, Vol. 46, No. 131). The total activity of the package calculated using the DOT method did meet the low specific activity limit as defined in 49 CFR 173.389(c).

(2) DESIGNATION OF APPARENT CAUSE:

This violation was caused by a misinterpretation of 49 CFR 172.203(d)(iii). Prior to receiving this violation, FPC personnel considered "activity of the package" to be the removable contamination for this type of material. As pointed out in the subject report, the total activity should also include the fixed activity.

(3) IMMEDIATE CORRECTIVE ACTIONS:

FPC has issued written instructions to responsible personnel to estimate the total activity of material of this type using the DOT-recommended method. This method, referenced in 31216 FR, Vol. 48, No. 131, stated that "It is conservatively estimated that swipes only remove 10% of the contamination...". Thus, by multiplying the calculated removable contamination by a factor of 10, FPC conservatively determines the total activity.

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(Continued)

4. LONG-TERM CORRECTIVE ACTIONS:

Florida Power Corporation will revise the Waste Handling Procedure(s) to specify that the method above be used to estimate the total activity for this type of material.

5. DATE OF FULL COMPLIANCE:

The Waste Handling Procedure(s) will be revised by March 1, 1984, as part of the procedure upgrade necessary to implement the new 10CFR 61.