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March 30, 1984
L-84-88

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

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250, 50-251
Inspection Report 84-01

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

Also included is a discussion of corrective actions which had previously been reviewed with your staff and clarified in a telephone conversation on this date.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. W. Williams, Jr.", written in a cursive style.

J. W. Williams, Jr.
Vice President
Nuclear Energy

JWW/PLP/js

Attachment

cc: Document Control Desk
Harold F. Reis, Esquire
PNS-LI-84-115

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PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 84-01

FINDING 1:

1. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Section IV.B of Appendix E requires that a licensee's emergency plans shall include emergency action levels based on in-plant conditions and instrumentation in addition to on-site and off-site monitoring.

Section (b) (10) of 10 CFR 50.47 requires that the licensee's emergency plans shall include a range of protective actions, consistent with Federal Guidance, for the plume exposure pathway EPZ for emergency workers and the public.

The Federal guidance on protective actions to be recommended to off-site officials for general emergencies is addressed in Appendix 1 of NUREG 0654/FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." This guidance is clarified by IE Information Notice No. 83-28: "Criteria for Protective Action Recommendations for General Emergencies".

Contrary to the above, in the case where prompt protective action recommendations are warranted by plant conditions and small doses are projected for the site boundary due to present small releases, no protective actions are addressed by the implementing procedures.

RESPONSE:

1. FPL concurs with the finding.
2. The reason for the finding was the emergency plan implementing procedures (EPIP) did not specifically direct the emergency coordinator to compare the protective action recommendation (PAR) guidelines based on dose projections with the PAR guidelines based on plant conditions prior to making the recommendation for protective action.
3. Corrective actions which have been taken include:
 - a. References have been added as appropriate in EPIP 20101 to instruct the emergency coordinator to compare the PAR based on plant conditions to the PAR based on dose projections prior to making the recommendation and to select the more conservative PAR.
 - b. Training of Plant Supervisors - Nuclear on protective action recommendations has been performed.
4. In order to prevent recurrence of similar events:
 - a. An augmented emergency plan training segment will be incorporated into the licensed operator requalification cycle.
5. Full compliance was achieved by February 1, 1984.

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RE: TURKEY POINT UNITS 3 AND 4
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FINDING 2:

10 CFR 50.54 (q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the planning standards of 50.47(b). 10 CFR 50.47 (b) (15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training.

Sections 5.2.1 and 5.2.3 of the Turkey Point Emergency Plan states, in part, that recommendations for protective actions will be made by the Emergency Coordinator. Section 2.2.2.1 states in part that after declaring an emergency the Plant Supervisor - Nuclear becomes the Emergency Coordinator.

Section 7.2.2.1 of the Turkey Point Emergency Plan states that Emergency Coordinators will be trained in dose assessments. Section 5.2 of EPIP 20126 states that the Emergency Coordinator may call a Chemistry Department representative to perform dose assessments.

Contrary to the above, Plant Supervisors - Nuclear interviewed during the inspection were not adequately trained in that they were unfamiliar with the Emergency Plan Implementing Procedures to the extent that incorrect protective action recommendation decisions were made for a range of situations and corresponding action levels. Additionally, the Plant Supervisors - Nuclear, initially the Emergency Coordinators, are not trained to perform dose calculations and were generally unfamiliar with the procedure. Also, individuals selected by the Plant Supervisor - Nuclear, on other than the day shift, to perform the dose calculations (one HP and one Chemistry Department staff) were unfamiliar with the procedures and unable to perform the required calculations.

RESPONSE:

1. FPL concurs with the finding with the following exception:
 - a. Emergency plan implementing procedures (EPIP) do not specify any dose calculation responsibilities for Health Physics and, therefore, there is no requirement for health physics personnel to be familiar with dose calculation procedures or able to perform the calculations.
2. The reasons for the finding were:
 - a. The dose calculation training of the chemistry technicians emphasized dose calculation using the primary method with the computer instead of the backup method of hand calculations.
 - b. The hand dose calculation training for the Plant Supervisors - Nuclear was not sufficient to instill a high confidence level.
 - c. EIPs 20101, 20103, and 20126 are not structured for optimum workability.

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3. As corrective action, the following actions have been taken:
 - a. Radiochemistry has been formally given the responsibility for performing dose calculations and the Plant Supervisors - Nuclear have been informed to contact Radiochemistry whenever dose calculations are required.
 - b. Chemistry technicians have been retrained in the hand calculation method of making dose assessments.
4. In order to prevent recurrence:
 - a. EIPs 20101, 20103, and 20126 are being reviewed and will be revised to improve workability.
 - b. An augmented emergency plan segment (including dose calculations and protective action recommendations) will be incorporated into the licensed operator requalification training cycle.
 - c. Chemistry technicians will receive training in dose calculations.
 - d. Appropriate dose calculation procedures will be revised to specify that Radiochemistry has responsibility for dose calculations.
5. Full compliance will be achieved by May 17, 1984.

CLARIFICATION TO ITEM 7. "CORRECTIVE ACTION"

By February 3, 1984, eight of twelve chemistry technicians were trained in Emergency Plan Implementing Procedure (EPIP) 20126. The remainder were trained by March 30, 1984. All Nuclear Plant Supervisors received training in EPIP 20101 and 20103. Watch Engineers will receive this training by May 17, 1984.