

USNRC REGION II
ATLANTA, GEORGIA

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November 13, 1984
L-84-329

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

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 250-84-27 and 251-84-28

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

Per discussions with your Mr. C. M. Hosey, a proposed Technical Specification change to allow the breaching of containment integrity of a unit at power or refueling by opening certain valves under administrative controls will be submitted by January 15, 1985. This exception is required to allow for certain surveillance and testing requirements.

There is no proprietary information in the report.

Very truly yours,

J. W. Williams, Jr.
for J. W. Williams, Jr.
Group Vice President
Nuclear Energy Department

JWW/JA/ms
Attachment

cc: Harold F. Reis, Esquire

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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-84-27 and 251-84-28

FINDING 1:

Technical Specification 4.7.1 requires that a carbon analysis for each emergency containment filter plenum be performed at least every 18 months or after 720 hours of system operation and that the analysis verify greater than 99.9% removal efficiency for elemental iodine within 45 days after removal of the sample.

Contrary to the above, carbon samples removed on July 20, 1982 and March 24, 1984, were not analyzed within 45 days of removal.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was an oversight by plant personnel in that the Technical Specification (TS) requirement was not identified on the Delivery and Work Authorization (DWA) sheet, transmitting the sample to an outside company for analysis.
- 3) Operating Procedure (OP) 4704.2, "Emergency Containment Charcoal Filters Surveillance Specimen Evaluations", has been revised to include specific references to the TS time limit for sample analysis of 45 days. Included in this revision is a note to include on the DWA for the sample analysis, that the test must be completed and results sent back to Turkey Point within two weeks of receipt of the sample in order to comply with TS.
- 4) No further corrective actions are deemed necessary.
- 5) Full compliance was achieved on September 5, 1984.

FINDING 2:

Technical Specification 6.8 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Appendix A of Regulatory Guide 1.33. Regulatory Guide 1.33 recommends that the licensee have a radiation work permit procedure. Plant Procedure HP-1, Radiation Work Permit, April 2, 1984, Paragraph 4.1.1 requires the licensee to have a specific radiation work permit for areas posted "RWP required for entry".

Contrary to the above, between August 6 - 22, 1984, bags of radioactive material were opened, material sorted, and tools and equipment decontaminated in the dry storage warehouse without an approved specific radiation work permit to perform these tasks.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that due to an anticipated change in work scope, the Radiation Work Permit (RWP) covering the decontamination operations was terminated. Another RWP was expeditiously authorized to include the change of work scope, however, the requirements for the decontamination operations were omitted due to an oversight.
- 3) A decontamination operation RWP 84-1968, "Dry Storage Building, Sort, Segregate and Decontaminate Tools and Equipment", was generated on August 23, 1984.

This event has been reviewed with all Health Physics Supervisors to make them cognizant of the importance of including all operations to be performed in a RWP and the significance of failing to do so.
- 4) No further corrective actions are deemed necessary.
- 5) Full compliance was achieved on August 23, 1984.