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**Florida
Power**
CORPORATION

May 31, 1985
3F0585-26

Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 85-05, Supplemental Response

Dear Sir:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

Walter S. Wilgus
Vice President
Nuclear Operations

AEF/feb

Attachment

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PDR ADOCK 05000302
Q PDR

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**FLORIDA POWER CORPORATION
RESPONSE**

INSPECTION REPORT 85-05

VIOLATION 85-05-01

10 CFR 20.103(a)(3) states in part that the licensee shall use measurements of radioactivity in the body, measurements of radioactivity excreted from the body, or any combination of such measurements as may be necessary for timely detection and assessment of individual intakes of radioactivity by exposed individuals.

10 CFR 20.103(c)(2) requires the licensee to maintain and implement a respiratory protection program that includes surveys and bioassays as appropriate to evaluate actual exposures.

Technical Specification 6.8.1 requires the station to establish, implement, and maintain approved written procedures covering various activities recommended in Appendix A of Regulatory Guide 1.33, November 1972, including the bioassay program.

Contrary to the above, the licensee did not have approved written radiation protection procedures for the calibration of the whole-body counting system presently in use. The current approved calibration procedure for the whole-body counting system (RP-214, Rev. 2, 11/28/81) referred to a measurement system no longer in use.

This is a Severity Level V violation (Supplement IV).

SUPPLEMENTAL NRC INFORMATION

The above violation cited your failure to have approved written radiation protection procedures for the calibration of the whole-body counting system presently in use. Your response stated that the bioassay program is not included in Appendix A of Regulatory Guide 1.33, November 1972 and therefore Florida Power Corporation was not in violation of Technical Specification procedural requirements.

We disagree with your interpretation of Regulatory Guide 1.33, Appendix A issued November 1972. Section G.5.c of the referenced guide states that the control of radioactivity in regard to personnel exposure which includes surveys and monitoring should be covered with written procedures. We believe that your whole-body counter was included in your personnel monitoring program, and as such, calibrations must be conducted in accordance with approved procedures. After careful consideration of your denial of the noted Violation, we have concluded, for the reasons presented in this letter, that the violation occurred as stated in the Notice of Violation.

SUPPLEMENTAL FPC RESPONSE

a) Corrective Actions to Avoid Similar Violations

This violation occurred because of our interpretation and belief that the whole body counting system is not included in Appendix A of Reg. Guide 1.33.

A procedure for the current whole body counting system which is consistent with the interpretation contained in your letter of May 7, 1985 was written.

The inclusion of the whole body counting system in the bioassay program should preclude similar violations.

b) Date of Full Compliance

Full compliance was achieved on February 28, 1985 when the above referenced procedure was issued.