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**Florida
Power**
CORPORATION

January 16, 1986
3F0186-16

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 85-34
Revised Response

Dear Sir:

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

Sincerely,

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

Attachment

Westafer(W01)C3-1

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-34
REVISED RESPONSE

VIOLATION 85-34-01

Technical Specification 6.11 required that procedures for radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Contrary to the above, Chemistry and Radiation Protection Procedure RP-230, MPC Hour Calculation Procedure, was inadequate in that the procedure did not contain a method for the licensee to calculate MPC hours for cases of radioactive material ingestion as required by 10 CFR 20.103 footnote 4.

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

RESPONSE

1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporations (FPC) agrees with the stated violation in that RP-230 does not contain a specific method for the licensee to calculate MPC hours for cases of radioactive material ingestion.

2) APPARENT CAUSE:

The cause of the violation was misinterpretation of 10 CFR 20.103 footnote 4. FPC interpreted this section to indicate that some judgement needs to be applied in evaluating which techniques and what procedures may be appropriate to the circumstances of the occurrence.

3) CORRECTIVE ACTION:

A procedure for the calculation of maximum permissible concentration hours (MPC) based on whole body count data was implemented on December 31, 1985.

4) ACTION TAKEN TO PREVENT RECURRENCE:

The above actions are considered adequate to prevent recurrence.

5) DATE OF FULL COMPLIANCE:

FPC was in full compliance December 31, 1985 after procedure revision and implementation.

VIOLATION 85-34-02

Technical Specification 6.8.1 stated that written procedures shall be established, implemented and maintained for certain activities including applicable procedures in Appendix A of Regulatory Guide 1.33, 1972. Appendix A of Regulatory Guide 1.33, November 1972, required procedures for surveys and monitoring.

Chemistry and Radiation Protection Procedure RSP-101, Basic Radiological Safety Information and Instructions for Radiation Workers, step 3.1.4 required that, when exiting the auxiliary building radiation control area (RCA), a whole body frisk must be performed in accordance with Section 3.3. Section 3.3 delineated the guidelines for pre-frisk instrument checks the individual was to perform and prescribed the manner in which a frisk was to be conducted.

Contrary to the above, procedures for surveys and monitoring were not adhered to in that on August 27-29, 1985, approximately 70 personnel exiting the auxiliary building 95 foot elevation RCA failed to perform instrument checks and frisks in accordance with the requirements contained in procedure RSP-01.

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

This violation is similar to Item 1 contained in a Notice of Violation sent to you in our March (sic.) 24, 1985 letter.

(The referenced violation was 85-12-02 dated May 24, 1985.)

RESPONSE:

1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporation (FPC) agrees with the stated violation in that personnel observed failed to perform instrument checks and frisks in accordance with the requirements contained in Procedure RSP-101.

2) APPARENT CAUSE:

The proper use of individual hand held friskers (RM-14) requires a high degree of attention to detail. An apparent lack of this attention during frisker use has been noted by NRC and FPC in the past. Contributing factors to the frequency of non-compliances are:

- a) The number of contractor personnel on-site which make waiting lines longer for both plant and contractor personnel causing some personnel to feel rushed in the frisking process and increasing background noise level due to conversation.
- b) The limited size of our facility (which began operation in 1977) results in somewhat crowded conditions impeding observations and enforcement.

3) CORRECTIVE ACTIONS:

Our corrective actions taken since Violation 85-12-02 have included advising all personnel of the findings and violation, rerouting the RCA entrance and exit so as to provide closer proximity to on-duty HP personnel for observation of frisking practices, and requiring senior supervisors and managers to observe and enforce frisking compliance. We are continuing to evaluate the performance of step-in, whole body friskers with automatic timing circuits and alarmed/controlled exit.

We have provided special training in frisking techniques to members of the security force, and have stationed a member of the security force at the primary RCA exit to monitor personnel frisking. The posting of this guard will continue until the number of contractor personnel has been reduced to a normal level of support.

4) ACTION TAKEN TO PREVENT RECURRENCE:

We are evaluating the above actions to determine if they are sufficient to prevent recurrence. However, we are additionally reviewing the traffic flow of personnel entering and exiting the RCA with intent to alleviate crowding in the frisking area. We will continue to evaluate other techniques for improving our assurance that personnel are properly frisking.

5) DATE OF FULL COMPLIANCE:

FPC considers the actions described above to have achieved full compliance.