



**Florida
Power**
CORPORATION

June 21, 1985
3F0685-22

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. 85-12

Dear Sir:

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

Sincerely,

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

AEF/feb

Attachment

DESIGNATED ORIGINAL

Certified By CB

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-12

VIOLATION 85-12-02

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 "RCA," a whole body frisk must be performed in accordance with Section 3.3." Section 3.3. delineated the "Guidelines for conducting a "Whole Body Frisk" using a RM-14 with HP-210 probe." This guidance indicated that hands be frisked for five (5) seconds each prior to picking up the probe. Personnel are instructed in notes to Section 3.3.2 that, "if any increase in count rate is noted, THEN return the probe to the suspected area of contamination for a minimum of five (5) seconds. If the ALARM sounds or a significant increase (i.e., greater than 50 cpm above background) is visual or audible response is noted, THEN notify Health Physics personnel immediately." The guidance recommended frisking the hands, head or hat, face, neck, front of body trunk, bottom of each foot, each dosimetry device or other small personal item for approximately five (5) seconds each. The guidance recommended the remainder of the body including the arms, legs, knees, buttocks, and back to be frisked slowly for approximately thirty (30) seconds. If this guidance is followed, a whole body frisk should take approximately 70 seconds.

Chemistry and Radiation Protection Procedure RP-101, Radiation Protection Manual, step 4.8.4.e recommended that, "prior to donning personal clothing, all individuals should conduct a Whole Body Frisk at the nearest frisking station" and 4.8.5.a required that "all personnel shall conduct a Whole Body Frisk prior to each exit from the 95 ft. elevation control complex RCA". Detailed frisking recommendations similar to those described in procedure RSP-101 are also contained in this procedure.

Contrary to the above, procedures RSP-101 and RP-101 were inadequate in that they failed to assure the implementation of the respective procedural requirement that whole body frisking "shall" or "must" be performed in accordance with the stated guidelines and on March 26-29, 1985, personnel were not performing adequate whole body frisks to permit detection of contamination at licensee action levels, in that of approximately 30 personnel observed at the reactor building exit and the auxiliary building 95 foot elevation Radiation Control Area (RCA) exit (two of these individuals were observed frisking at both exits), the following practices were observed:

- a. Generally, picking up the frisker probe without first frisking their hands;
- b. Frisking for significantly less than 30 seconds.
- c. Failing to frisk areas of the body, other than the hands, face and feet, and;
- d. Moving the frisker probe so fast that contamination significantly in excess of licensee action levels would have to be present on the individual in order for the instrument audible response to indicate that an area needed additional frisking.

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

RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation agrees inadequate frisking as delineated in paragraphs a. through d. of Violation 85-12-02 occurred. We agree some discrepancies may have existed between the two procedures addressing guidelines for whole body frisking.

(2) Apparent Cause of Violation:

The cause of this violation is failure to comply with guidelines as described in frisking procedures.

(3) Corrective Actions:

In order to resolve the procedural discrepancies addressing guidelines for whole body frisking, RP-101 "Radiation Protection Manual" was deleted on April 12, 1985. "Basic Radiological Safety Information and Instructions for Radiation Workers" (RSP-101), states in part ... "WHOLE BODY FRISK" MUST BE PERFORMED IN ACCORDANCE WITH ... (this procedure).

This procedure provides general guidance for conducting a whole body frisk.

It is therefore felt, that any conflicts which may have existed between RP-101 and RSP-101 have been resolved and that the current procedural requirements are in full compliance with Technical Specification 6.8.1.

(4) Action Taken to Prevent Recurrence:

FPC will evaluate methods for improving compliance with frisking procedures. In the interim, supervisory staff will be assigned on a random basis to perform periodic spot checks of frisking practices to ensure adequate frisking is being performed. Provisions for disciplinary action and termination for repetitive violations exist and will be enforced when violations are found.

(5) Date of Full Compliance:

Florida Power Corporation was in full procedural compliance as of April 12, 1985, however, FPC is continuing to pursue positive and realistic means of assuring compliance.

A supplement to this response will be submitted after the evaluation of frisking practice improvements is completed on or before August 15, 1985.

VIOLATION 85-12-03

10 CFR 20.203(f) requires each container of licensed material to bear a durable, clearly visible label identifying the radioactive contents. The label shall bear the radiation caution symbol and the words "CAUTION - RADIOACTIVE MATERIAL" and shall provide sufficient information to permit individuals handling or using the containers or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

Contrary to the above, a yellow bag which contained a contaminated hose measuring approximately 8 mrem/hr on contact was determined to contain a quantity of radioactive material greater than that listed in 10 CFR 20, Appendix C, and the bag label did not include the radiation caution symbol.

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

RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation agrees this violation was contrary to the current Region II interpretation of the requirements specified by 10 CFR 20.203(f) in that a yellow bag containing a contaminated hose did not include the radiation caution symbol.

(2) Apparent Cause of Violation:

The cause of this violation was due to FPC's interpretation of the labeling requirements in 10 CFR 20.203(f).

(3) Corrective Actions:

Specifications for the purchase of bags used to contain radioactive material have been revised to include the "Radiation Caution Symbol".

(4) Action Taken to Prevent Recurrence:

The bags currently in use which do not have this symbol will be replaced or so labeled.

In addition, Florida Power Corporation is currently pursuing obtaining an interpretation of 10 CFR 20.203(f) from NRR.

(5) Date of Full Compliance:

Florida Power Corporation is in full compliance as of June 17, 1985.

VIOLATION 85-12-04

10 CFR 19.11 required that certain documents, notices or forms be conspicuously posted to permit their being observed by individuals on their way to or from licensed activities.

Contrary to the above, on March 26, 1985, the required documents, notices or forms were not conspicuously posted to permit observation by individuals engaged in licensed activities in that:

- a. The required documents, notices or forms on the bulletin board located on auxiliary building 95 ft. elevation near the Health Physics office were obscured from view by other materials posted on top of the required posting.
- b. The bulletin boards in the Rusty Building and the turbine building entrance did not have all the required materials posted.

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

RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation concurs with the stated violation in that required postings were not conspicuously posted.

(2) Apparent Cause of Violation:

The cause of this violation was inadequate facilities for maintaining posting of required documents resulting in some documents being removed and others covered over with miscellaneous items.

(3) Corrective Actions:

When the discrepancy was pointed out to FPC personnel, the bulletin boards were immediately updated with required posting material. Since that time, frequent checks have been made of the bulletin boards to ensure that they have complete posting material and that the material is conspicuous.

(4) Action Taken to Prevent Recurrence:

New posting facilities will be installed for regulatory postings only. Additionally, plaques will be installed to identify the unique purpose of these posting facilities.

Florida Power Corporation will have the new posting facilities installed by September 15, 1985.

(5) Date of Full Compliance:

Florida Power Corporation was in full compliance as of March 28, 1985.