



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

JUN 24 1980

In Reply Refer To:
RII:RZ
50-335/80-06

Florida Power and Light Company
Attn: A. Schmidt, Vice President
Power Resources
Post Office Box 529100
Miami, FL 33152

Gentlemen:

Subject: Health Physics Appraisal

During the period of March 10 - March 21, 1980, the NRC conducted a special appraisal of the health physics program at the St. Lucie Unit 1 Nuclear Power Station. This appraisal was performed in lieu of certain routine inspections normally conducted in the area of health physics. Areas examined during this appraisal are described in the enclosed report (50-335/80-06). Within these areas, the appraisal team reviewed selected procedures and representative records, observed work practices, and interviewed personnel. It is recommended that you carefully review the findings of this report for consideration in effecting improvements to your health physics program.

The appraisal conducted at the St. Lucie facility was part of the NRC's general program to strengthen the health physics program at nuclear power plants. As a first step in this effort, the Office of Inspection and Enforcement is conducting these special appraisals of the health physics programs at all operating power reactor sites. (These appraisals were previously identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement). One of the objectives of the health physics appraisals is to evaluate the overall adequacy and effectiveness of the total health physics program at each site and to identify areas of weakness that need to be strengthened. We also intend to use the findings from these appraisals as a basis for effecting improvements in NRC requirements and guidance. Consequently, our appraisal encompassed certain areas which may not be explicitly addressed by current NRC requirements. The next step that is planned in this overall effort will be the imposition of a requirement by the Office of Nuclear Reactor Regulation (NRR) that all licensees develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for significant weaknesses identified during the special appraisals of the current health physics program. Guidance for the development of this plan will incorporate pertinent findings from the special appraisals and will be issued by NRR in the fall of this year.

The findings of this appraisal at the St. Lucie facility indicate that, although your overall health physics program is adequate for present operations, the permanent staff of the health physics department appeared insufficient in number.

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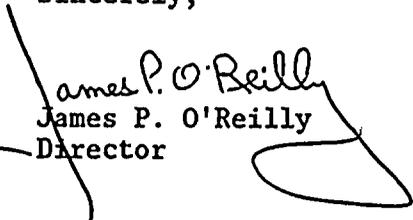
This is discussed in more detail in Appendix A, "Notice of Significant Appraisal Findings". We recognize that an explicit regulatory requirement pertaining to the significant weakness identified in Appendix A may not currently exist. However, to assist our determination as to whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty (20) days of your receipt of this letter, describing your corrective action for the significant weakness identified in Appendix A including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

The findings of this appraisal also indicate certain activities which apparently were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation enclosed herewith as Appendix B. The items of noncompliance in Appendix B have been categorized into the levels of severity as described in our Criteria For Enforcement Action dated December 1, 1974. Section 2.201 of Part 2, Title 10, Code of Federal Regulations, requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this material contains any information that you believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in Subparagraph (b)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, this letter and the enclosures will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,


James P. O'Reilly
Director

Enclosures:

1. Appendix A, Notice of Significant Appraisal Findings
2. Appendix B, Notice of Violation
3. Office of Inspection and Enforcement
Inspection Report No. 50-335/80-06

cc: (See Page 3)

JUN 24 1980

cc w/encl:

C. M. Wethy, Plant Manager
Post Office Box 128
Ft. Pierce, FL 33450

Nat Weems, Assistant QA Manager
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Ft. Pierce, FL 33450

APPENDIX A

NOTICE OF SIGNIFICANT APPRAISAL FINDINGS

Florida Power and Light Company
St. Lucie

License No. DPR-67

As discussed in the body of this report, the NRC is concerned about the apparent insufficient number of persons on the health physics staff at the St. Lucie 1 facility.

The majority of the negative findings of this report can be traced to the apparent inadequate health physics staffing. All the items of noncompliance listed in Appendix B can be traced to the lack of staff (or lack of time available for existing staff) necessary to accomplish the tasks required. It is fortuitous that the present understaffed health physics group has functioned as well as it has. However, if a major radiological safety event happens in the future the circumstances may not be as favorable.

Staffing deficiencies contributed to the item of noncompliance listed in Appendix B concerning the retraining program for health physics technicians. The proficiency of the health physics staff obviously must be maintained to enable them to cope competently with both normal and abnormal situations.

Staffing deficiencies also contributed to those problems and items of noncompliance listed in Appendix B in the personnel dosimetry area. For example, significant discrepancies between pocket dosimeter and TLD results were not evaluated, the TLD reader was not calibrated at sufficient frequency, and procedural requirements governing the wearing of dosimetry devices were not strictly enforced.