APPENDIX B
NOTICE OF VIOLATION

Florida Power and Light Company
St. Lucie

License No. DPR-67

Based on the NRC inspection of March 10-21, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated Decmeber 31, 1974.

A. As required by Technical Specification 6.4.1, a retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55. Section 5.5 of ANSI N18.1-1971 states that a training program shall be established which maintains the proficiency of the operating organization.

Contrary to the above, the licensee did not have an adequate retraining program which maintained the proficieincy of the Health Physics staff, nor did the licensee have a training program for replacement personnel on the Health Physics staff in that the basic elements listed in ANSI N18.1-1971 Section 5.5.1 were not contained in the program.

This is an infraction.

B. As required by Technical Specification 6.9, procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure. Procedure HP-30, Revision 7, Paragraph 8.3.6 requires that the plastic bag holding the dosimetry, thermoluminesent dosimeter (TLD) and neutron TLD be taped to the front of the upper torso and Paragraph 4.3 of the Health Physics Manual requires dosimetry to be worn on the front side of the upper trunk.

Contrary to the above, during the period of inspection, numerous instances of improper wearing of dosimeters were observed. Examples included TLD clipped on belts at the hip side, TLD's shielded by pocket dosimeter and TLD's turned backwards.

Additional procedural discrepancies were noted during the inspection period. These include: (1) Respirators were stored face up (contrary to Procedure HP-62, Revision 2, Paragraph 8.5.2); (2) form HP-62 was not being used (contrary to Procedure HP-62, Revision 2, Paragraph 8.4.2.2); (3) Form HP-65 was not being used on SCBA units (contrary to Procedure HP-65,

Revision 1, Paragraph 8.1.8.2); (4) unique numbering was not being used on respiratory equipment (contrary to Procedure HP-62, Revision 2, Paragraph 8.4.2.2); (5) results of response checks were not being recorded (contrary to Procedure HP-13B, Revision 1, Paragraph 8.17); (6) and Form HP-1.1 was not being utilized in all instances (contrary to Procedure HP-1, Revision 9, Paragraph 8.2.4.5); and (7) the TLD reader was not being calibrated at an adequate frequency to ensure proper operability (inadequate Procedure HP-12, Revision 4).

This in an infraction.

C. As required by 10 CFR 20.103(c) "When respiratory protective equipment is used to limit the inhalation of airborne radioactive material pursuant to paragraph (b)(2) of this section, the licensee may make allowances for such use in estimating exposures of individuals to such materials provided that such equipment is used as stipulated in Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection"." Section C.8.a of Regulatory Guide requires "Respirable air of approved quality be provided" in accordance with "Commodity Specification for Air", G-7.1-1966, which in Section 2.3, entitled "Quality Tests" for Grade D air requires tests for oxygen, hydrocarbons, carbon monoxide and cardon dioxide.

Contrary to the above, procedure HP-62, Revision 2, does not provide for the sampling or testing of the breathing air supply for oxygen, condensed hydrocarbons or carbon dioxide content and the air was being used without this sampling.

This is an infraction.

D. As required by Technical Specification 6.8.1 written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33, Appendix A, Section G.5(c) states that written procedures for surveys and monitoring should be prepared. Plant Procedure HP-41 states, in part, that if an item is to be removed as an unconditional release from the Radiation Control Area, Health Physics shall ascertain that the item meets the criteria described in Plant Procedure HP-71, Paragraph 4.3.2. Procedure HP-71, paragraph 4.3.2 states that the release limit for uncontrolled material leaving the RCA is 100 counts per minute per probe area (beta-gamma) using the RM-14/HP-210 instrument (approximately equivalent to 1,000 dpm/ probe area) with no detectable removable contamination.

Contrary to the above, during the inspection a wrench was found in the clean tool room located outside the Radiation Control Area, which when tested was observed to be contaminated to 30,000 dpm per probe area.

This is an infraction.