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50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to deficiencies noted in revs to offsite dose calculation manual & process control program.

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MARCH 27 1987

L-87-144

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Staff Review of Revisions to the Offsite Dose
Calculation Manual and the Process Control Program

By letter dated January 12, 1987 (E. G. Tourigny to C. O. Woody) the staff provided Florida Power & Light Company (FPL) with a Safety Evaluation of revisions to the St. Lucie Units 1 and 2 Offsite Dose Calculation Manual (ODCM) and Process Control Program (PCP). The staff stated that this Safety Evaluation was conducted to confirm that the changes to the ODCM do not reduce the accuracy or reliability of the dose calculations or setpoint determinations and that changes to the PCP do not decrease the effectiveness of the Program.

The staff noted that the revisions to ODCM and PCP are generally consistent with NRC criteria but that several deficiencies were noted in the revisions to each. The NRC asked FPL to address its resolution of the identified deficiencies. Attached is FPL's response to each of the deficiencies.

If there should be any questions concerning this response, please contact us.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/EJW/gp

Attachments (2)

cc: Dr. J. Nelson Grace, Region II, USNRC
USNRC Resident Inspector, St. Lucie Plant

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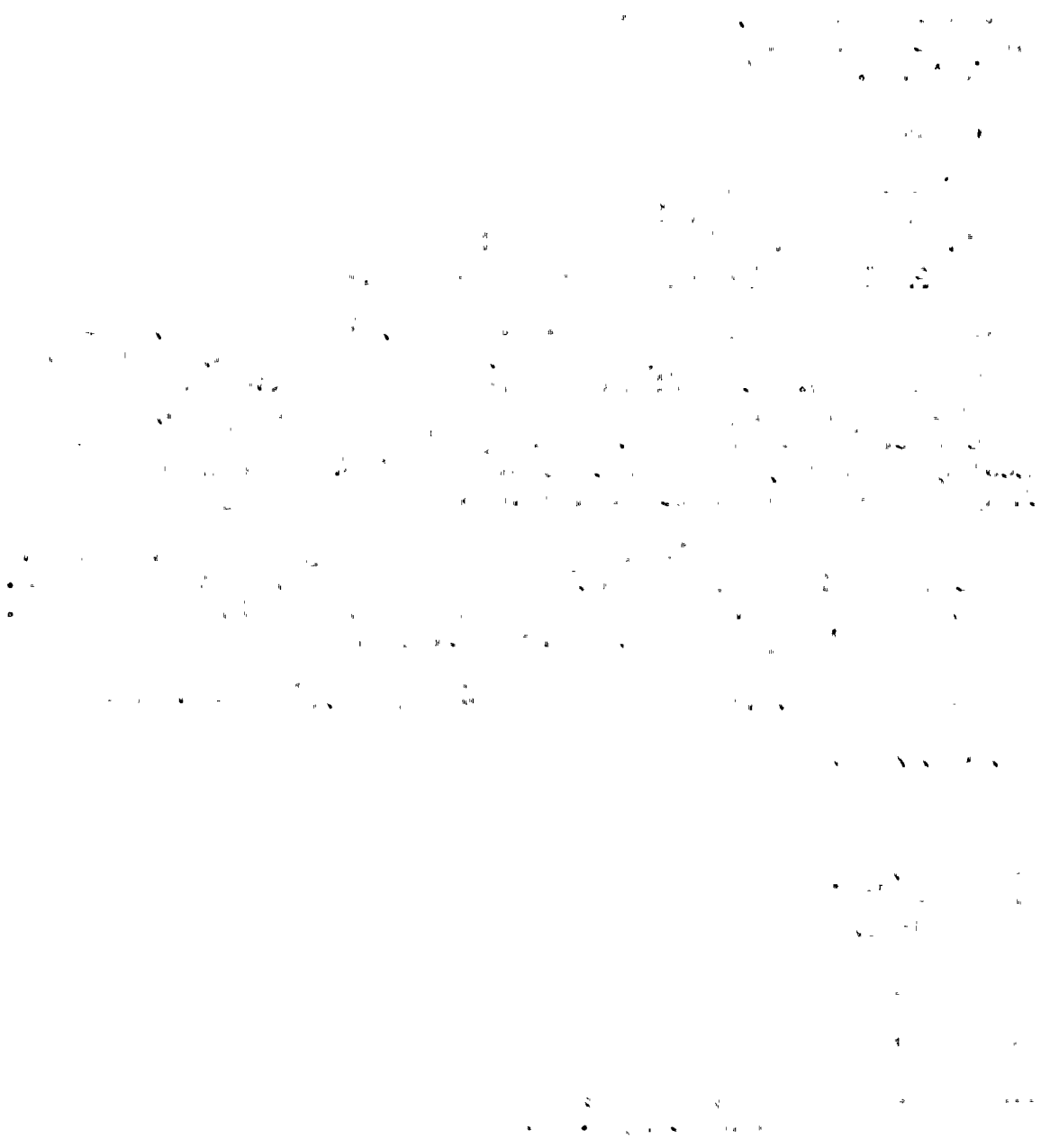


ATTACHMENT 1

NRC NOTED DEFICIENCIES
WITH REGARD TO THE ST. LUCIE UNITS 1 AND 2
OFFSITE DOSE CALCULATION MANUAL (REVISION 6)

Item 1: The equation in Step 1.2.2.2 should reference Step 1.2.1.3 instead of Step 1.2.1.1.

Response 1: This item was corrected in Revison 07 to the ODCM.

Item 2: The equation in Steps 2.2.3.5 and 2.2.3.7 should include Q instead of Q.

Response 2: This item was corrected in Revision 07 to the ODCM.

Item 3: The dose rate due to iodines, tritium, and particulates is calculated for the thyroid of an infant from the grass-cow-milk pathway. The calculation should be made for the thyroid of a child from the inhalation pathway for consistency with Draft 7 to Revision 3 of NUREG-0472.

Response 3: Using the infant with grass-cow-milk pathway calculation, per the ODCM, is more conservative than using the child inhalation for dose rate purposes. FPL intends to continue using the more conservative grass-cow-milk calculation.

Item 4: The grass-cow-milk pathway in the Table of Step 2.6.5.1 should reference Step 2.6.3.6 instead of Step 2.6.3.7.

Response 4: Revision 07 of the ODCM is correct in that Step 2.6.3.F is the same as Step 2.6.3.6.

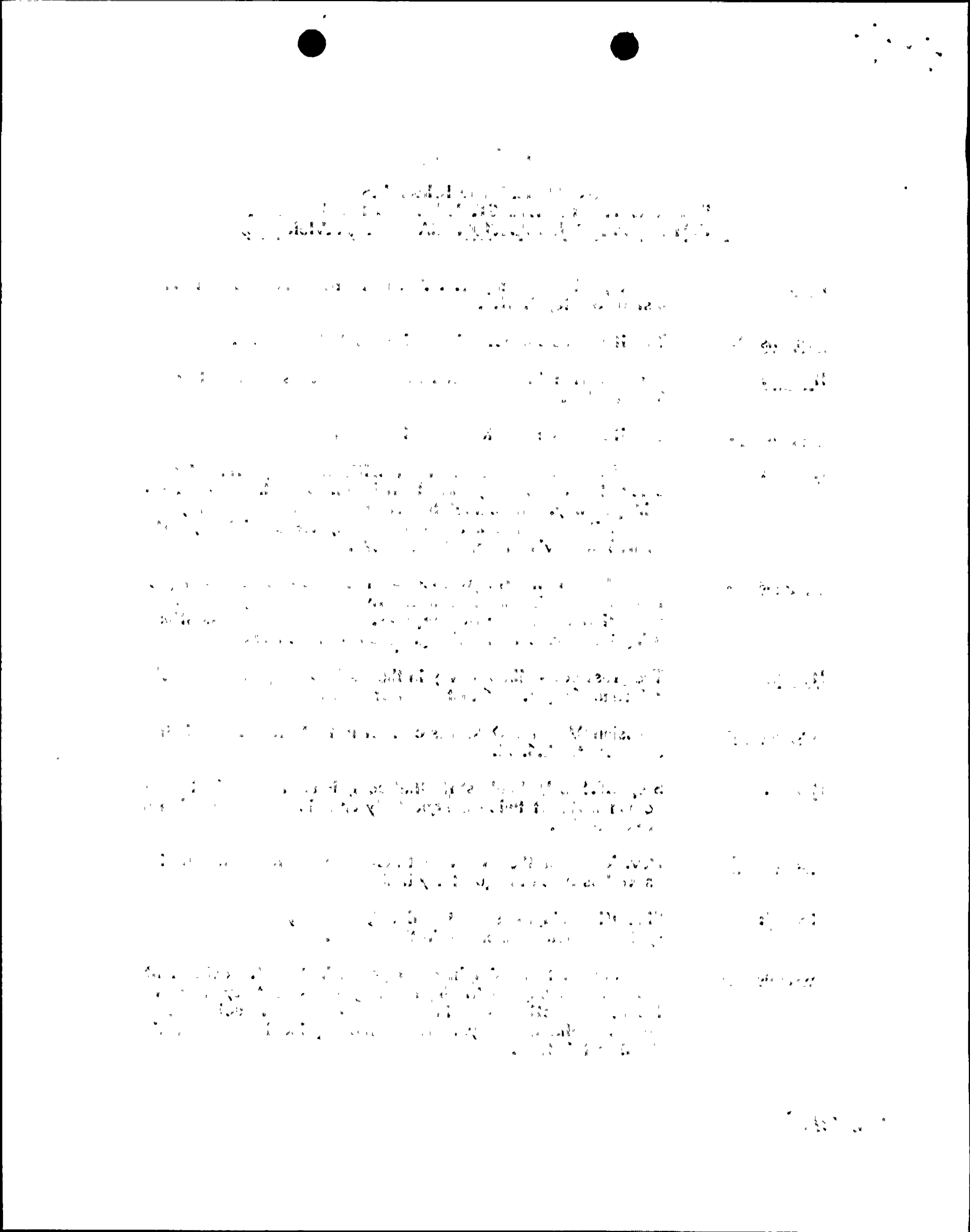
Item 5: Step 3.0.1 (3.1) should state that compliance to 40 CFR 190 be demonstrated if twice the quarterly or twice the annual limits are exceeded.

Response 5: Revision 08 of the ODCM will include twice the annual limits as well as twice the quarterly limits.

Item 6: Simplified diagrams of the liquid, gaseous, and solid waste systems should be included in the ODCM.

Response 6: FPL does not use simplified diagrams in the St. Lucie Plant ODCM. Drawings of the liquid and gaseous waste systems are located in Section 11 of the FSARs for both St. Lucie Units 1 and 2. Solid waste systems are not applicable to St. Lucie Plant at this time.

EJW4/013/2



Item 7: The licensee changed Ag-110m to Ag-110 throughout the tables in the ODCM. The nuclide of concern is Ag-110m and should be restated as Ag-110m.

Response 7: FPL considers Ag-110m the same as Ag-110 for ODCM purposes. NRC Region II inspectors requested FPL adopt ORNL/NUREG/TM-102 as the official reference for Technical Specification radiological effluent nuclides and FPL made the ODCM reflect ORNL/NUREG/TM-102.

ATTACHMENT 2

NRC NOTED DEFICIENCIES
WITH REGARD TO THE ST. LUCIE UNITS 1 AND 2
PROCESS CONTROL PROGRAM (REVISION 4)

Item 1: Sections 3.2.2, 4.2 and 8.2 of Administrative Procedure Number 0520025 could be deleted since these sections are concerned with processes other than the dewatering of resin beads.

Response 1: FPL desires to leave these sections in the Administrative Procedure. Technical Specification 3/4.11.3 requires a PCP for the dewatering of bead resin only. Sections 3.2.2, 4.2 and 8.2 of AP 0520025, Rev 5, exceeds the Technical Specification requirements. These items were also discussed in IE Information Notice 87-07.

Item 2: The methodology of assuring no free liquids by the visual inspection method referenced in Section 4.3 of Administrative Procedure Number 0520025 should be described. Clarification should be provided on how a person can visually inspect for free liquid during the transfer of the resin beads or in the final disposal container after it is loaded.

Response 2: FPL has determined that a visual inspection can only reveal free standing water above the resin level in the container. Since this method is inconclusive, this section of the procedure will be deleted. Determining the amount of free liquids is contained in other sections of the PCP by reference to approved vendor procedures.

Item 3: Clarification should be provided on whether Chem Nuclear is contracted to perform the dewatering process or Chem Nuclear equipment was purchased and is operated by the licensee.

Response 3: FPL has ownership of all equipment used in the dewatering process and FPL personnel perform the actual operations. AP 0520025 will be revised to reflect FPL ownership and operation of dewatering equipment.

Item 4: Chem Nuclear documents referenced in Sections 3.2 and 6.0 of Administrative Procedure Number 0520025 should be in agreement with the documents referenced in Section 6.0 of Operating Procedure Number 0520023.

Response 4: Administrative Procedure 0520025 will reference Health Physics HP-49 "Dewatering of radioactive bead resin". The reference to CNSI project 11118 will be the same in both FPL procedures.

EJW4/013/4

Item 5: The PCP should state that the containers listed in Section 8.1 of Administrative Procedure Number 0520025 have been certified by the State of South Carolina for use at the Barnwell, South Carolina, land disposal facility.

Response 5: FPL will revise procedure 0520025 to reflect the need that high integrity containers be certified by the State of South Carolina for use at the Barnwell, SC, Land Disposal Facility.

Item 6: A description or sketch of the plant's dewatering system and the vendor's interface requirements should be included in the PCP.

Response 6: FPL will revise Administrative Procedure 0520025 to include a description of all equipment used.