

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8705060002 DDC DATE: 87/04/27 NOTARIZED: NO DOCKET #
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389

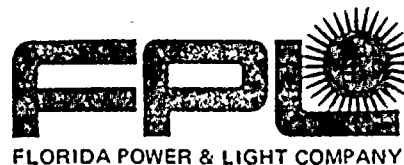
AUTH. NAME AUTHOR AFFILIATION
 ODY, C. O. Florida Power & Light Co.
 RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-335/87-04 & 50-389/87-04. Corrective actions: vendor onsite solidification stopped & Health Physics Procedure HP-40, "Shipping of Radiactive Matl," will be revised

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	PD2-2 LA		1	0		PD2-2 PD		1	1
	TOURIGNY, E		1	1					
INTERNAL:	AEOD		1	1	DEDRO		1	1	
	ENF LIEBERMAN		1	1	NRR ROE, M. L		1	1	
	NRR/DOEA DIR		1	1	NRR/DREP/EPB		1	1	
	NRR/DREP/RPB		2	2	NRR/DRIS DIR		1	1	
	NRR/BMAS/ILRB		1	1	OQC/HDS2		1	1	
	<u>REG FILE</u>		1	1	RES SPEIS, T		1	1	
	RGN2 FILE 01		1	1					
EXTERNAL:	LPDR		1	1	NRC PDR		1	1	
	NSIC		1	1					



APRIL 27 1987

L-87-189
10 CFR 2.201

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
Inspection Report 335/87-04 and 389/87-04

Florida Power & Light Company has reviewed the subject inspection report, and pursuant to the provisions of 10 CFR 2.201 the response is attached.

There is no proprietary information in the report.

Very truly yours,


C. O. Woody
Group Vice President
Nuclear Energy

COW/GRM/gp

Attachment

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

8705060002 870427
PDR ADDCK 05000335
Q PDR

IE01
/ /



VIOLATION A(I)

- A. 10 CFR 20.311(d)(1) requires any generating licensee who transfers radioactive waste to a land disposal facility to prepare all wastes so that the waste is classified according to 10 CFR 61.55 and meets the waste characteristic requirements in 10 CFR 61.56.

10 CFR 61.56(b)(1) states that waste must have structural stability which will generally maintain its physical dimensions and its form under expected disposal conditions.

10 CFR 61.56(b)(2) states that in no case shall the liquid exceed one (1) percent of the volume of the waste when the waste is in a disposal container designed to ensure stability, or 0.5 percent of the volume of the waste for waste processed to a stable form.

10 CFR 20.311(d)(3) states that any generating licensee who transfers radioactive material to a land disposal facility shall conduct a quality control program to assure compliance with 10 CFR 61.55 and 61.56 which must include management evaluation of audits.

Contrary to the above, the licensee failed to adequately prepare radioactive waste for disposal as follows:

- 1) The requirements for structural stability and minimum volume of liquid in waste were not met in that, on November 24, 1986, Radioactive Waste Shipment No. 86-61 consisting of sludge solidified with cement, packaged in two steel liners was improperly solidified in that approximately fifteen percent of the contents of one liner had failed to solidify while the entire contents of the second liner were paste-like in consistency.

RESPONSE TO VIOLATION A(I)

- A. 1. FPL agrees that the two liners in Radioactive Waste Shipment No. 86-61 were not properly solidified. FPL does not agree that the requirement for minimum volume of liquid in waste was not met. The tests conducted by South Carolina Department of Health and Environmental Control (SCDHEC), FPL, and Chem Nuclear indicated the criteria for minimum volume of liquids (0.5%) had been met.
2. Analysis of the material in the liners indicated that proper solidification did not take place due to:
 - a) Insufficient mixing of waste and process chemicals.
 - b) Generation of ammonia (due to the waste form) which inhibited solidification.

3. The liners were returned to St. Lucie, cut open, and the unsolidified material was removed and reprocessed and re-packaged. Solidification was verified by manual soundings (tapping) on the liner and random core boring.

The liners were subsequently transported to the burial site, re-tested by the SCDHEC, found to be acceptable and buried. The remaining "solidified" liners containing the same material were subjected to the same on-site testing. One liner was found to be suspect. The vendor received permission to ship the liner to his site for further testing and analysis from SCDHEC. When the liner was cut open at the vendor's site, it was found to be a solidified free-standing monolith. Subsequently, the liner was re-sealed and buried. The remaining liners containing this material were also tested successfully and buried.

4. Vendor on-site solidification has been stopped. No further solidification will take place until changes take place in the Process Control Program to give assurance of full compliance.
5. Compliance (with respect to the problem material) was achieved by April 7, 1987.

VIOLATION A(2)

2. The licensee's quality control program to assure appropriate characterization of waste was inadequate in that it contained no requirements for licensee evaluation and/or verification of vendor activities and as a consequence, on November 24, 1986, the contents of the two steel liners described above were not solid as required.

RESPONSE TO VIOLATION A(2)

1. FPL concurs with the violation.
2. FPL improperly assumed that the vendor's quality program concurrent with the process verification assured an acceptable product.
3. On-site solidification processes were terminated.
4. Prior to solidification taking place on-site, FPL will have controls in place which will provide reasonable assurance that the solidification is complete prior to shipment.
5. Full compliance will be achieved prior to on-site solidification of radioactive waste for shipment.



VIOLATION B

- B. 10 CFR 71.5(a) requires each licensee who transports licensed material outside of the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, to comply with the applicable requirements of the regulations appropriate to the mode of transport to the DOT in 49 CFR Parts 170 through 189.

49 CFR 173.475(i) states that before each shipment of any radioactive materials package, the shipper shall ensure by examination or appropriate tests that external radiation and contamination levels are within allowable limits.

Contrary to the above, the licensee failed to comply with the requirements of the DOT in that no surveys of the underside of the transport vehicles were performed for radioactive material shipments: No. 86-46 on September 23, 1986; No. 86-47 on October 2, 1986; No. 86-49 on October 9, 1986, No. 86-52 on October 14, 1986, No. 86-53 on October 21, 1986; and No. 86-54 on October 23, 1986.

RESPONSE TO VIOLATION B

1. FPL concurs with the violation on the basis that documented evidence was not available to indicate the underside radiation surveys were performed for these shipments. However, FPL believes that surveys were performed to insure compliance with shipping requirements of the transport vehicle. Additional surveys taken by the State of Florida, prior to the shipment leaving the site, verified that the radiation limits including the underside of the transfer vehicle were within specification.
2. The cause for the finding was that survey documents did not provide a location for recording dose rates from the underside of the transport vehicle.
3. Vehicle survey sheet (HPS-65.1, 2, 3, & 4) will be changed to provide for recording dose rates from the underside of the transport vehicles. Appropriate dose rates were recorded on subsequent shipments.
4. Health Physics Procedure HP-40, Shipping of Radioactive Material, will be revised to require recording of dose rates from the underside of the transport vehicle.
5. Full compliance was achieved April 1, 1987. Procedure changes will be incorporated by May 30, 1987.

VIOLATION C

- C. 10 CFR 20.203(f)(1) states that, except as provided by 10 CFR 20.203(f)(3), licensed material shall bear a durable, clearly visible label identifying the radioactive contents.

Contrary to the above, containers of licensed material were not properly labeled in that, on March 3, 1987, 28 B-25 metal boxes located in a temporary storage area behind Unit 2 and 12 B-25 metal boxes located adjacent to the Steam Generator Blowdown Treatment Facility did not bear durable, visible labels identifying the radioactive contents. The exemptions of 10 CFR 20.203(f)(3) did not apply.

FPL RESPONSE TO VIOLATION C

1. FPL concurs with the violation.
2. The boxes in question were staged for transportation. FPL plant procedures for compacting waste did not address any additional labeling requirements. This oversight was the cause for the finding.
3. All packages were properly posted prior to the completion of the inspection.
4. Health Physics procedures for waste packaging will be revised to require "RADIOACTIVE MATERIAL" tagging of all Dry Active Waste (DAW) packages being staged for subsequent disposal.
5. Full compliance was achieved by March 4, 1987. Procedures will be revised by May 30, 1987.