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SUBJECT: Responds to violation noted in Insp Rept 50-335/88-19.

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OCTOBER 13 1988

L-88-446
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 335/88-19 Reply to Notice of Violation

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

Very truly yours,

DA Sagel
W. F. Conway
Senior Vice President - Nuclear

WFC/GRM/cm

Attachment

cc: Malcolm L. Ernst, Acting Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

GRMRTNOV

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Violation A

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in this part and (2) are reasonable under the circumstances to evaluate the extent of the radiation hazards that may be present.

Technical Specification 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Health Physics Procedure HP-20, Area Radiation and Contamination Surveys, Revision 7, dated June 18, 1987, requires in Section 8.6.2.1 that any area containing removable surface contamination in excess of 1000 disintegrations per minute per one hundred square centimeters (dpm/100 cm²) beta/gamma or 20 dpm/100 cm² alpha shall be posted as a Contaminated Area.

Contrary to the above, the licensee failed to comply with the survey requirements in that, on August 2, 1988, the floor of the Unit 2 Cask Washdown Second Floor Roof was noted to have smearable contamination to 50,000 disintegrations per minute per one hundred square centimeters but the area had not been surveyed since July 7, 1988, and was not posted or controlled as a contaminated area.

Response to Violation A

1. Florida Power and Light concurs with the violation.
2. The contract Health Physics (HP) personnel responsible for the surveys did not know where the key to the area was located and did not perform the required surveys. The HP personnel involved did not take followup action to obtain the key and the surveys were missed. The key to the area was a non-standard key for HP areas and this was a contributing factor to the violation.
3. The area was immediately surveyed and posted as required by procedure.
4. The lock cores on the doors have been changed to allow routine access by HP personnel without having to obtain special keys. The HP contractor personnel involved are not employed by FPL at this time. However, responsible HP personnel have been counseled on the need to complete all required surveys.
5. Full compliance has been achieved.

Violation B

10 CFR 20.203(f)(1) requires each container of licensed material to bear a durable, clearly visible label identifying the radioactive contents. 10 CFR 20.203(f)(2) requires that the label bear the radiation caution symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL" and also provide sufficient information to permit individuals handling or using the container, or working in the vicinity thereof to take precautions to avoid or minimize exposure.

Contrary to the above, on August 2, 1988, two contaminated thermal shield transfer casks and a pair of contaminated wire rope slings located on the Unit 2 Cask Washdown Second Floor Roof were not labeled as required. The exceptions contained in 10 CFR 20.203(f)(3) were not applicable.

Response to Violation B

1. Florida Power and Light concurs with the violation.
2. The cause for the violation was due to oversight on the part of HP personnel performing surveys of the casks and slings.
3. The casks and slings were immediately labeled as required by 10 CFR 20.203(f)(2).
4. The requirements to properly label containers of radioactive materials have been reemphasized to responsible HP personnel.
5. Full compliance has been achieved.