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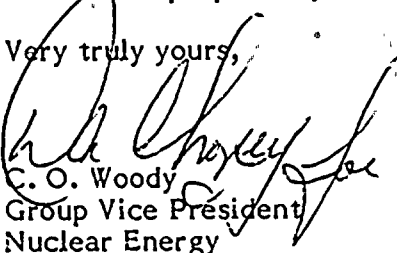
Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

RE: St. Lucie Units 1 & 2
Docket Nos. 50-335, 50-389
Inspection Report 86-09 and 86-08

Florida Power & Light Company has reviewed the subject inspection report, and a response is attached.

There is no proprietary information in the report.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/SAV/eh

attachment

cc: Harold F. Reis, Esquire
PNS-LI-86-228

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RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 86-09 and 86-08

ATTACHMENT

Violation A.

10 CFR 71.5 requires that licensees who transport licensed material outside the confines of their plants or other place of use, or who deliver licensed material to a carrier for transport, comply with the applicable requirements of the regulation appropriate to the mode of transportation of the Department of Transportation in 49 CFR Parts 170 through 189.

49 CFR 173.441(a) states that except as provided in 49 CFR 173.441(b), each package of radioactive materials offered for transportation shall be designed and prepared for shipment so that under conditions normally incident to transportation the radiation level does not exceed 200 millirem per hour at any point on the external surface of the package.

Contrary to the above, on December 13, 1985, the licensee shipped two boxes of radioactive materials, Box No. 85-105 and Box No. 85-112, to a land disposal facility at Barnwell, S. C. with dose rates of 250 and 400 millirem per hour, respectively, on the external surfaces of the packages. The exceptions of 49 CFR 173.441(b) did not apply because the shipment was not made in an enclosed vehicle.

Response A.

1. Florida Power and Light (FPL) concurs with this violation.
2. The violation occurred due to the interpretation of a change in D.O.T. shipping regulations.
3. The shipping procedure has been changed to reflect the new regulation. A detailed description of the Radiation Level Limitations for package and vehicles has been incorporated into the procedure. There have been no violations since this finding.
4. The initial corrective actions are sufficient to avoid further violations.
5. Full compliance has been achieved.



Violation B.

10 CFR 71.5 requires that licensees who transport licensed material outside the confines of their plants comply with the applicable requirements appropriate to the mode of transport of the Department of Transportation (DOT) 49 CFR Parts 170 through 189.

49 CFR 173.425(b)(1) requires that packaged shipments of low specific activity (LSA) material consigned as exclusive use must be packaged in a DOT Specification 7A Type A package or in a strong, tight package so that there will be no leakage of radioactive material under conditions normally incident to transportation.

Contrary to the above, the licensee failed to package a shipment of LSA radioactive material in a DOT Specification 7A Type A package or a strong, tight package in that on October 22, 1985, shipment No. 85-49 arrived at the burial facility with a hole in one B-25 metal box.

Response B.

1. Florida Power and Light (FPL) concurs with this violation.
2. Based upon all of the evidence considered, FPL believes the most probable reason for the violation was due to personnel oversight during inspection of the radioactive materials shipment.
3. The shipping procedure has been changed to provide for a more thorough inspection of containers prior to shipment. There have been no violations since this finding.
4. The initial corrective actions are sufficient to avoid further violations.
5. Full compliance has been achieved.

Violation C.

10 CFR 20.103(c)(2) provides in part that the licensees may make allowance for use of respiratory protective equipment in estimating exposures of individuals to radioactive materials in air provided that the licensee maintains and implements a respiratory protection program that includes, as a minimum, written procedure regarding supervision and training of personnel and maintenance of records.

Contrary to the above, on April 18, 1986, the NRC inspector noted the licensee was making allowance in its Maximum Permissible Concentration hour assignment records for use of respiratory protective equipment in estimating exposures of individuals to radioactive material in air for purposes of determining compliance with 10 CFR 20.103. However, the licensee did not have written procedures regarding maintenance of records showing that an individual had been issued a respirator.

Response C.

1. Florida Power and Light (FPL) concurs with this violation.
2. The violation was due to an incorrect interpretation of the regulations by the Health Physics Group.
3. The issuance of respiratory protection devices has been proceduralized. There have been no violations since this finding.
4. The initial corrective actions are sufficient to avoid further violations.
5. Full compliance has been achieved.

