FLORIDA POWER & LIGHT COMPANY

September 14, 1978
L-78-299

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:GLT
50-250/78-11
50-251/78-11

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,

Robert E. Uhrig
Vice President

REU/MAS/cpc

Attachment

cc: Robert Lowenstein, Esquire

7811030168

cp

ATTACHMENT

Re: RII:GLT
50-250/78-11
50-251/78-11

Finding A

Technical Specifications 6.13.1.a requires, in part, that each high radiation area in which the intensity of radiation is greater than 100 millirem/hr, but less than 1000 millirem/hr, shall be barricaded and conspicuously posted as a high radiation area.

Contrary to the above, the inspectors observed the following instances where high radiation areas were not barricaded and posted as required:

1. On June 19 an inspector observed that the entrance to the north filling room in the Radwaste Building was unposted and unbarricaded although the survey board at the entrance listed areas inside with readings as high at 400 millirem/hr. These readings were confirmed by a review of the most recent radiation survey results in the health physics file.

2. On June 21 an inspector observed several drums stored outside in the radiation controlled area. Measurements made by the inspector revealed that dose levels were a maximum of 160 millirem/hr at approximately one and one-half feet, indicating that a high radiation area existed. However, the drums were not posted or barricaded as such.

Response A

1. It is standard practice to post the entrance to the north filling room in the Radwaste Building in accordance with Technical Specification 6.13.1.a. The barricade and posting consist of a high radiation area sign hanging from an appropriately colored rope across the doorway. However, at the time of the inspection, one end of the rope was unhooked from its side of the doorway and hooked to the other side of the doorway. The barrier had been temporarily relaxed to permit personnel entry into the room, but had not been properly restored when the room was exited. The barrier was restored before the end of the inspection. Compliance was achieved as of June 23, 1978.

2. The area surrounding the drums was properly barricaded and posted as a high radiation area before the end of the inspection. Compliance was achieved as of June 23, 1978.

To help prevent recurrence of these findings, Operating Procedure 11550.4, "Scheduling of Periodic Health Physics Activities", will be revised to schedule a once per shift inspection of the Radiation Controlled Area by Health Physics personnel. The procedure will be revised by October 31, 1978.

Finding B

Technical Specification 6.11 states that 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.

Contrary to the above, the inspectors observed the following instances where the requirements of approved health physics procedures were not being adhered to:

1. Procedure HP-41, "Movement of Material Inside the Radiation Control Area", requires that externally contaminated material that is to be moved from one work site to another or placed in storage shall, whenever possible, be contained in double polyethylene bags and the bag openings shall be double sealed to prevent the release of contamination. The procedure also requires that radioactive wastes generated on a particular job should be bagged, taped and placed in a designated area for disposal. During the period June 19-23, the inspectors observed several bags of radioactive waste which were open or which were only single sealed and were in the storage area, and bags of radioactive waste which were not sealed and were stored in stairwells or room entrances to be moved to the storage area.

2. Procedure HP-65, "Respiratory Equipment Maintenance Program" requires that the fixed contamination levels on respiratory equipment be less than 10,000 dpm prior to returning the equipment to service. On June 21, an inspector surveyed several respirators in the ready-for-issue bin and found respirators with fixed contamination levels between 50,000 and 150,000 dpm. The levels were verified by licensee representatives.

Response B

1. The material observed by the inspector was bagged, taped, and stored in accordance with Health Physics Procedure HP-41, "Movement of Material Inside the Radiation Control Area," before the end of the inspection. Compliance was achieved as of June 23, 1978.

   The periodic inspections of the Radiation Controlled Area scheduled by the change to Operating Procedure 11550.4, "Scheduling of Periodic Health Physics Activities", discussed under Response A are also intended to help prevent future findings of this type.

2. The respirators found by the inspector to be contaminated to levels higher than 10,000 dpm were removed from service before the end of the inspection. Compliance was achieved as of June 23, 1978.

   The cause of the higher than 10,000 dpm respirator contamination levels has been traced to personnel misunderstanding of the allowable respirator contamination levels. To help prevent recurrence, a detailed explanation of the applicable limits has been given by Health Physics supervision to all appropriate personnel.

Finding C

Technical Specification 4.13 requires that each sealed radioactive source which exceeds the quantity listed in 10 CFR 30.71 Schedule B for by-product materials or 0.1 microcuries for other sources shall be tested for leakage and/or contamination at intervals not to exceed six months.

Contrary to the above, the sealed sources installed in four process radiation monitors and which contained licensed quantitites of radioactive material had not been tested for leakage for a period of twelve months.

Response C

The sealed sources in the four process radiation monitors are being tested for leakage. Compliance will be achieved by September 15, 1978.

To provide a more practical approach to sealed source testing at Turkey Point, a proposed Technical Specification amendment based on standard technical specifications for sealed source contamination is being prepared for submittal to the NRC Office of Nuclear Reactor Regulation. In the interim, until a revised specification is approved, the present Turkey Point specification for radioactive materials source surveillance will be followed.

ing D

Technical Specification 6.4.1 requires that "a retraining and replacement training program 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 . . . .". Plant procedure HP-81 "Health Physics Training" specifies the requirements for a retraining program. Paragraph 8.1.6 of procedure HP-81 specifies that retraining for radiation protection men will consist of 10 hours of lecture, demonstration and practical exercises in all aspects of health physics activities.

Contrary to the above, the retraining program for radiation protection men had not been conducted as required. A review of plant records indicated that personnel on-site for more than two years had not received the specified retraining nor had a formal retraining program been defined or implemented.

Response D

Section 5.5 of ANSI N18.1-1971 requires the establishment of a training program which maintains the proficiency of the "operating organization". Section 5.5.1 then lists subjects to be included in the training program (such as startup and shutdown procedures, normal plant operating procedures, operational limitations and setpoints, etc.). It is our interpretation that the referenced sections of ANSI N18.1-1971 apply to plant operations personnel, as this appears to be evident from the list of training subjects.

Training for Health Physics personnel is the subject of Health Physics Procedure HP-81, "Health Physics Training". Section 8.1.6, Refresher Training for Health Physics Personnel, instructs that the following training be given:

> "Approximately ten hours of lecture, demonstration and practical exercise covering all aspects of health physics activities at Turkey Point (see attachment 5)."
>
> (Attachment 5 is a list of topics to be covered.)

As written, neither ANSI N18.1-1971 or Health Physics Procedure HP-81 require the retraining to be completed within a given period of time. However, as a result of Finding D, we have initiated retraining in compliance with HP-81. The first two-hour training session has been given twice (July 20 and July 27, 1978) and the second session is planned for the period between the Unit 4 post-refueling startup and the Unit 3 shutdown for steam generator inspection. In general, our present plan is to schedule a two-hour training session every month unless either Unit 3 or Unit 4 has an outage during that month.

To help prevent recurrence of this finding, the FPL Corporate Health Physics staff will periodically monitor the status of the retraining program.