



UNITED STATES  
 NUCLEAR REGULATORY COMMISSION  
 REGION II  
 101 MARIETTA STREET, N.W.  
 ATLANTA, GEORGIA 30323

AUG 05 1985

Report Nos.: 50-250/85-27 and 50-251/85-27

Licensee: Florida Power and Light Company  
 9250 West Flagler Street  
 Miami, FL 33101

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point Nuclear Plant

Inspection Conducted: June 24 - 28, 1985

Inspector: R. R. Marston by W. E. Cline 7/25/85  
 R. R. Marston Date Signed

Approved by: W. E. Cline 7/25/85  
 W. E. Cline, Chief Date Signed  
 Emergency Preparedness Section  
 Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection entailed 31 inspector-hours onsite in the areas of emergency preparedness.

Results: Of the areas inspected, no violations or deviations were identified.

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## REPORT DETAILS

## 1. Persons Contacted

## Licensee Employees

- \*C. Baker, Plant Manager
- \*V. A. Kaminskas, Acting Operations Superintendent-Nuclear
- \*J. Kappes, Maintenance Superintendent
- \*J. Arias, Jr., Regulatory and Compliance Supervisor
- \*W. C. Miller, Nuclear Training Supervisor
- \*R. J. Earl, Quality Control Supervisor
- \*L. Goebel, Requal Training Supervisor
- \*L. W. Bladow, Quality Assurance Supervisor
- R. J. Spooner, Florida Power and Light Quality Assurance Supervisor
- \*P. W. Hughes, Health Physics Supervisor
- \*E. R. LaPierre, Nuclear Chemistry Supervisor
- R. J. Conroy, Plant Supervisor-Nuclear
- G. G. Jones, Plant Supervisor-Nuclear
- K. S. Metzger, Plant Supervisor-Nuclear
- \*R. D. Mothena, Florida Power and Light Emergency Planning Coordinator
- E. J. Traczyk, Fire Protection Coordinator
- D. T. Hunt, Security Coordinator
- R. J. Miller, Florida Power and Light Field Engineer
- \*O. E. Suero, Electrical Maintenance Staff

Other licensee employees contacted included engineers, technicians, operators, security force members, and office personnel.

## Other Organizations

M. Lietz, Coordinator, Emergency Management, Metro-Dade  
 Dr. H. R. Nateman, Chief, Emergency Facilities, Baptist Hospital

## NRC Resident Inspectors

- T. Peebles
- \*D. R. Brewer

\*Attended exit interview

## 2. Exit Interview

The inspection scope and findings were summarized on June 28, 1985, with those persons indicated in paragraph 1 above. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.



3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Emergency Detection and Classification (82201)

Pursuant to 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Sections IV.B and IV.C, this program area was inspected to determine whether the licensee used and understood a standard emergency classification and action level scheme.

The inspector reviewed the licensee's classification procedures. The event classifications in the procedures were consistent with those required by the regulations. The classification procedures did not appear to contain impediments or errors which could lead to incorrect or untimely classification.

The inspector verified that the licensee's notification procedures included criteria for initiation of offsite notifications and for development of protective action recommendations. The notification procedures required that offsite notifications be made promptly after declaration of an emergency.

The inspector discussed with licensee representatives the coordination of Emergency Action Levels (EALs) with State and local officials. Licensee documentation showed that the licensee had discussed the EALs during October 1984 with State and local officials, and that these officials agreed with the EALs used by the licensee.

Interviews were held with three Plant Supervisors-Nuclear (PSNs) to verify that they understood the relationship between core status and such core damage indicators as containment dome monitor, inadequate-core-cooling indicator, high-range effluent monitor, fuel temperature indicator, and containment hydrogen monitor. All interviewees appeared knowledgeable of the various core damage indications and their relationship to core status.

The responsibility and authority for classification of emergency events and initiation of emergency action were prescribed in licensee procedures and in the emergency plan. Interviews with selected key members of the licensee's emergency organization revealed that these personnel understood their responsibilities and authorities in relation to accident classification, notification, and protective action recommendation.

Walk-through evaluations involving accident classification problems were conducted with three Plant Supervisors-Nuclear. All personnel interviewed promptly and properly classified the hypothetical accident situations presented to them, and appeared to be familiar with appropriate classification procedures.

No violations or deviations were identified in this program area.



5. Protective Action Decision-Making (82202)

Pursuant to 10 CFR 50.47(b)(9) and (10) and 10 CFR Part 50, Appendix E, Section IV.D.3, this area was inspected to determine whether the licensee had 24-hour-per-day capability to assess and analyze emergency conditions and make recommendations to protect the public and onsite workers, and whether offsite officials had the authority and capability to initiate prompt protective action for the public.

Walk-through evaluations involving protective action decision-making were conducted with three Plant Supervisors-Nuclear. Personnel interviewed appeared to be cognizant of appropriate onsite protective measures and aware of the range of protective action recommendations appropriate to offsite protection. Personnel interviewed were aware of the need for timeliness in making initial protective action recommendations to offsite officials. Interviewees demonstrated adequate understanding of the requirement that protective action recommendations be based on core condition and containment status even if no release is in progress.

No violations or deviations were identified in this program area.

6. Notification and Communication (82203)

Pursuant to 10 CFR 50.47(b)(5) and (6) and 10 CFR Part 50, Appendix E, Section IV. D, this area was inspected to determine whether the licensee was maintaining a capability for notifying and communicating (in the event of an emergency) among its own personnel, offsite supporting agencies and authorities, and the population within the emergency planning zone (EPZ).

The inspector reviewed the licensee's notification procedures. The procedures were consistent with the emergency classification and EAL scheme used by the licensee. The inspector determined that the procedures made provisions for message verification.

The content of initial emergency messages was reviewed and discussed with licensee representatives. The initial messages appeared to meet the guidance of NUREG-0654, Sections II.E.3 and II.E.4 with certain exceptions. Licensee representatives stated that the format and content of the initial emergency messages had been reviewed by State and local government authorities and were approved by the State.

The licensee's management control program for the prompt notification system was reviewed. According to licensee documentation and discussions with licensee representatives, the system consisted of 58 fixed sirens and one mobile siren at Plant St. Lucie, and 35 fixed sirens near Plant Turkey Point. A review of licensee records verified that the system as installed was consistent with the description contained in the emergency plan. Maintenance of the system had been provided for by the licensee. The inspector reviewed siren test records for the two plants. The records showed that tests were conducted every two weeks including siren motion, public address mode, and air horn. A full-cycle test was conducted annually

as specified in NUREG-0654, Appendix 3. No offsite agency problems relating to the prompt notification system were disclosed during these discussions.

No violations or deviations were identified in this program area.

7. Changes To The Emergency Preparedness Program (82204)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR 50, Appendix E, Sections IV and V, this area was reviewed to determine whether changes were made to the program since the last routine inspection (September 1984) and to note how these changes affected the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector reviewed the licensee's procedures AP0109.1 and AP0110.4, governing review and approval of changes to the plan and procedures. The inspector verified that changes to the plan and procedures were reviewed and approved by management. It was also noted that all such changes were submitted to NRC within 30 days of the effective date, as required. The inspector noted that the Emergency Plan (EP) was not completely implemented by the Emergency Plan Implementing Procedures (EPIPs). The EP was also implemented by some of the routine Chemistry Procedures and Health Physics procedures. The inspector stated that these procedures implementing the plan were subject to the requirements of 10 CFR 50, Appendix E, Part V concerning submittal to the NRC. Compliance to this requirement will be evaluated in a subsequent inspection (250, 251/85-27-01).

Discussions were held with licensee representatives concerning recent modifications to facilities, equipment and instrumentation. Licensee representatives stated that there were no significant changes in this area.

The organization and management of the emergency preparedness program were reviewed. The inspector verified that there had been no significant changes in the organization or assignment of responsibility for the plant and corporate emergency planning staffs since the last inspection. The inspector's discussion with licensee representatives also disclosed that there had been no significant changes in the organization and staffing of the offsite support agencies since the last inspection.

The inspector reviewed the licensee's program for distribution of changes to the emergency plan and procedures. Document control records showed that appropriate personnel and organizations were sent copies of plan and procedural changes, as required.

No violations or deviations were identified in this program area.

8. Shift Staffing and Augmentation (82205)

Pursuant to 10 CFR 50.47(b)(2) and 10 CFR Part 50, Appendix E, Sections IV.A and IV.C, this area was inspected to determine whether shift staffing for



emergencies was adequate both in numbers and in functional capability, and whether administrative and physical means were available and maintained to augment the emergency organization in a timely manner.

Shift staffing levels and functional capabilities of all shifts were reviewed and found to be consistent with the guidance of Table B-1 of NUREG-0654. The licensee has established a duty officer system and a duty roster so that essential off-shift personnel are available if needed. The call-in procedure appeared to be effective in meeting Table B-1 goals.

No violations or deviations were identified in this program area.

9. Knowledge and Performance of Duties (Training)(82206)

Pursuant to 10 CFR 50.47(b)(15) and 10 CFR Part 50, Appendix E, Section IV.F, this area was inspected to determine whether emergency response personnel understood their emergency response roles and could perform their assigned functions.

The inspector reviewed the description (in the emergency plan) of the training program, training procedures, and selected lesson plans, and interviewed members of the instructional staff. Based on these reviews and interviews, the inspector determined that the licensee had established a formal emergency training program.

Records of training for key members of the emergency organization for the period April 1984 to June 1985 were reviewed. The training records revealed that personnel designated as alternates in the emergency organization were provided with appropriate training. According to the training records, the type, amount, and frequency of training were consistent with approved procedures.

The inspector conducted walk-through evaluations with selected key members of the emergency organization. During these walk-throughs, individuals were given various hypothetical sets of emergency conditions and data and asked to talk through their response as if such an emergency actually existed. The individuals demonstrated familiarity with emergency procedures and equipment, and no problems were observed in the areas of emergency detection and classification, assessment action (to include plant conditions), and protective action decision-making.

No violations or deviations were identified in this program area.

10. Public Information Program (82209)

Pursuant to 10 CFR 50.47(b)(7) and 10 CFR Part 50, Appendix E, Section IV.D.2, this area was inspected to determine whether basic emergency planning information was disseminated to the public in the plume-exposure-pathway emergency planning zone (EPZ) on an annual basis.



The licensee has developed emergency response information brochures for use by the public residing in or frequenting the 10-mile EPZs around each plant. Licensee representatives stated that the brochure was updated annually. Licensee documentation dated December 1984 showed that development of the brochures was coordinated with the appropriate offsite authorities. The inspector reviewed the current brochures and verified that they included the information specified by NUREG-0654, Section II.G.

No violations or deviations were identified in this program area.

11. Licensee Audits (82210)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program.

Records of audits of the program were reviewed. The records showed that independent audits of the program were conducted by Plant Quality Assurance (QA) in September-December 1984 and Corporate QA in November-December 1985 and by Corporate QA of the plan program in March-April 1985. These audits fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated, and that findings concerning the interfaces were made available to State and local government authorities. Audit findings and recommendations were presented to plant and corporate management. Discussion with licensee representatives indicated that the licensee complied with the five-year retention requirement for such reports.

Licensee emergency plans and procedures required critiques following exercises and drills. Licensee documentation dated December 1984 showed that critiques were held following periodic drills as well as the annual exercise. The records showed that deficiencies were discussed in the critiques, and recommendations for corrective action were made.

The licensee's program for follow-up action on audit, drill, and exercise findings was reviewed. Licensee procedures required follow-up on deficient areas identified during audits, drills, and exercises. The inspector reviewed licensee records which indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a tracking system as a management tool in following up on actions taken in deficient areas.

No violations or deviations were identified in this program area.

12. Inspector Follow-up (92701)

- a. (Closed) Inspector Follow-up Item (IFI) 250/84-36-01 and 251/84-37-01: Late declaration of General Emergency after loss of FP barriers. The inspector reviewed training records which showed that Emergency Coordinators received training in classification of events involving loss of fission product barriers.



- b. (Closed) IFI 250/84-36-02 and 251/84-37-02: Operator training in plant parameter values. The inspector reviewed training records which showed that operators received training on monitors, normal readings for those monitors, and the activity indicated by those readings.

13. Coordination With Offsite Agencies (82206)

The inspector held discussions with licensee representatives regarding the coordination of emergency planning with offsite agencies. Written agreements existed with those offsite support agencies specified in the Radiological Emergency Plan. The inspector determined through telephone conversations with representatives of local support agencies that annual training and coordination were done with licensee participation. The training of local agencies has been conducted by the counties with input from the licensee.

No violations or deviations were identified in this program area.

