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           50-251 Turkey Point Plant, Unit 4, Florida Power and Light C      05000251  
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 WOODY, C. O.                      Florida Power & Light Co.  
 RECIP. NAME                      RECIPIENT AFFILIATION  
    Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/87-36 &  
 50-251/87-36. Corrective actions: Procedures 3/4-OP-038.1,  
 "Preparation for Refueling Activities" & 3/4-OP-040.3,  
 "Refueling Preshuffle in Spent Fuel Pit" revised.

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U. S. Nuclear Regulatory Commission  
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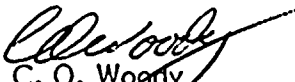
Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 87-36

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 Department

COW/SDF/gp

Attachment

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

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NO. 50-250, 50-251  
IE INSPECTION REPORT 250-87-36 & 251-87-36

FINDING A:

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained to meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33.

Regulatory Guide 1.33, Appendix A requires procedures for personnel monitoring and special work permits.

Licensee Procedure O-HPA-002, August 12, 1986, Section 3.2.1 requires individuals to fully understand and follow all requirements of the Radiation Work Permit (RWP).

RWP 87-1004, Auxiliary Building Unit #3, Spent Fuel Pit Shuffle Fuel/Perform Refueling Operations, March 4, 1987, Section 8 requires Health Physics (HP) coverage for moving fuel.

Contrary to the above, on May 30, 1987, a licensed operator entered the Unit 3 Spent Fuel Pit area in the afternoon and continued fuel reshuffling activities without HP coverage.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error, in that the operator who performed the fuel reshuffling activities did not assure that Health Physics (HP) coverage was present during the reshuffling. Contributing to the error was an interruption in the work. At the time of the interruption, the HP technician and the operator both left the area. When the operator returned, the HP technician was not present. Even though no HP coverage was present, the operator recommenced the reshuffle.
- 3) The following corrective step has been taken:

Procedures 3/4-OP-038.1, "Preparation for Refueling Activities" and 3/4-OP-040.3, "Refueling Preshuffle in the Spent Fuel Pit", were revised. Steps were added to assure that the HP Shift Supervisor is notified when a preshuffle commences, and to assure that HP coverage is available prior to fuel movement.

- a) The operator performing the above fuel reshuffle will be counseled.
- b) Additional measures, consisting of the establishment of administrative controls which will prevent unauthorized resumption of fuel movement will be taken. These controls will consist of changes and additional specific instructions, as



required, to all operations procedures related to fuel movement. These changes will require proper HP notification prior to any fuel movement.

c) Also, operations will implement a "Refueling Restart Check List" prior to the next refueling outage. This check list will incorporate the requirements for RWP's at the appropriate points in order to assure that HP coverage will be present when required.

5) a) Full compliance for item 3 above was achieved by October 30, 1987.

b) Full compliance for item 4 above will be achieved by January 31, 1988.

#### FINDING 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 of the Department of Transportation (DOT) in 49 CFR Parts 170 through 189.

49 CFR 172.200 requires a person, who offers hazardous material for transportation, to describe the hazardous material on shipping papers.

CFR 172.101 defines radioactive material as a hazardous material.

49 CFR 172.203(D)(1) requires the description for a shipment of radioactive material to include the name of each radionuclide in the radioactive material and the activity contained in each package of the shipment in terms of curies, millicuries, or microcuries.

Contrary to the above, on January 20, 1987, the licensee failed to include on the shipment manifest for radioactive waste shipment 87-03, the name of each radionuclide in the radioactive material and the correct activity contained in each package.

#### RESPONSE:

1) FPL concurs with the finding.

2) The reason for the finding was personnel error. The error occurred while transferring data from Health Physics (HP) form HP-77, "Radwaste Summary Form", to the "Radioactive Waste Shipment Manifest Form." During the process of transferring the Antimony-125 data, a transposition error occurred.

3) The supervisor performing the activity was counseled.

4) To preclude recurrence of this event, radwaste release forms HP 72/L, "Powdex Resin Liner Supply Release Form", HP 72/C, "Specification Container Release Form", and HP 72/W, "LSA Box Shipping Release Form", will be revised to require that independent verification was performed of the appropriate documents in order to ensure that the data is transferred properly and accurately.





a) Full compliance for item 3 above was achieved by October 29, 1987.

b) Full compliance for item 4 above will be achieved by November 27, 1987.

In response to your concern over the implementation of the corrective actions for finding (50-250/87-15-01, 251/87-15-01), concerning the failure to post Notice of Violation (NOV) and response as required by 10 CFR 19.11(a)(4), bulletin boards have been affixed at the contractor's entrance of the south gate. These bulletin boards have the notice posted detailing where the posting requirements can be found. In addition, the bulletin boards will be checked weekly to ensure that the posting notice has not been removed.

