



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

JUL 01 1988

Report Nos.: 50-250/88-12 and 50-251/88-12

Licensee: Florida Power and Light Company  
 9250 West Flagler Street  
 Miami, FL 33102

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point Plant, Units 3 and 4

Inspection Conducted: June 6-10, 1988

Inspector: James L. Kreh 30 June 1988  
 J. L. Kreh Date Signed

Approved by: T. R. Decker 6/30/88  
 T. R. Decker, Section Chief Date Signed  
 Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection was conducted in the area of emergency preparedness, and included review of the following programmatic elements: (1) emergency plan and implementing procedures; (2) emergency facilities, equipment, instrumentation, and supplies; (3) organization and management control; (4) training; and (5) independent reviews/audits.

Results: In the areas inspected, no violations or deviations were identified. The findings of this inspection appeared to indicate that the licensee was prepared to respond effectively to a radiological emergency at the Turkey Point Plant.

8807120154 880701  
 PDR ADDCK 05000250  
 Q PNU



## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*J. Anderson, Supervisor, QA Regulatory Compliance
- \*J. Arias, Jr., Regulatory Compliance Supervisor
- \*L. Bladow, QA Superintendent
- \*D. Chaney, Engineering Manager
- \*J. Cross, Plant Manager
- \*T. Finn, Training Department Supervisor
- V. Kaminskas, Supervisor, Reactor Engineering Department
- \*G. LaGarde, Emergency Planning Coordinator
- J. Maisler, Emergency Planning Manager (Corporate)
- \*J. Odom, Site Vice President
- \*L. Pearce, Operations Superintendent
- P. Salkeld, Plant Supervisor-Nuclear
- M. Slawinski, Science and Fundamentals Instructor
- \*A. Taylor, Emergency Planning Technician

Other licensee employees contacted during this inspection included operators, technicians, and administrative personnel.

#### Nuclear Regulatory Commission

- \*D. R. Brewer, Senior Resident Inspector

\*Attended exit interview

### 2. Emergency Plan and Implementing Procedures (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), Appendix E to 10 CFR Part 50, and Section 7 of the licensee's Radiological Emergency Plan, this area was inspected to determine whether significant changes were made to the emergency preparedness program since the inspection of March 1987, and to assess the impact of any such changes on the overall state of emergency preparedness at the facility.

The inspector reviewed the licensee's system for making changes to the Radiological Emergency Plan (REP) and the Emergency Plan Implementing Procedures (EIPs). The inspector verified that licensee management approved all revisions to the REP and EIPs issued since March 1987, and that these revisions were submitted to the NRC within 30 days of the effective date, as required. Controlled copies of the REP and EIPs in the Technical Support Center (TSC) and the Control Room were examined and found to be current revisions.

REP Revision 17, effective April 26, 1988, had not been received for formal review by cognizant staff in the NRC Regional office prior to the inspection. Discussion with a licensee representative and selective review by the inspector indicated that no major changes in the emergency preparedness program were implemented via Revision 17.

The inspector reviewed records pertaining to the emergency declarations which occurred since January 1, 1987. The following is a listing of those events which resulted in implementation of the REP (each was classified as a Notification of Unusual Event):

<u>Date</u>	<u>Description of Event</u>
02/06/87	Shutdown required by expiration of LCO [limiting condition for operation]
03/10/87	Loss of containment integrity at Unit 4 personnel hatch
04/15/87	Transport of a contaminated worker to a hospital
09/19/87	Nonreturnable reactor coolant system leakage exceeding 10 gpm
10/12/87	Hurricane warning
12/18/87	Loss of engineered safety feature requiring shutdown by Technical Specifications
05/06/88	Security event

For each of these events, notifications to the State, counties, and NRC were accomplished within the required time limits following the emergency declaration. In addition, licensee documentation indicated that the Emergency Planning Coordinator reviewed the response to each event for problems or inconsistencies which may have occurred.

No violations or deviations were identified.

### 3. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Pursuant to 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(q), and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's emergency response facilities and other essential emergency equipment, instrumentation, and supplies were maintained in a state of operational readiness.

The inspector toured the onsite emergency response facilities (ERFs) including the Control Room, Technical Support Center (TSC), and Operations Support Center (OSC). The licensee was in the process of moving the OSC from the I&C Building to the Health Physics Building. According to observations by the inspector and statements by licensee representatives,

no other significant ERF changes were made since the last inspection. Emergency supplies and equipment in the Control Room, TSC, and OSC were selectively examined and found to be maintained in an appropriate state of readiness.

The inspector conducted a detailed review of licensee records dated March 1987 to April 1988, to determine compliance with the requirement in REP Section 7.4 that all emergency equipment and instrumentation (maintained in the Control Room, TSC, and OSC, as well as field monitoring equipment at the Florida City Substation) be inventoried, operationally checked, and inspected at least once each calendar quarter and following each use. The records disclosed that this requirement was being met on a monthly (rather than quarterly) basis in accordance with Health Physics procedure HP-90.

The inspector discussed the Turkey Point Alert and Notification System (ANS) with licensee representatives. The ANS used 42 fixed electronic sirens in Dade and Monroe Counties and 1 mobile-siren route for the Ocean Reef community in Monroe County. In May 1988, officials in Dade County began monthly full-cycle siren tests. The sirens were maintained by the General Engineering group based at the licensee's corporate office. A permanent, full-time licensee contractor performed individual siren tests biweekly to verify both rotation and sound production. The licensee's records showed that availability of the sirens, calculated on a 12-month rolling average, was between 95 and 96 percent throughout the period January 1987 to May 1988.

No violations or deviations were identified.

#### 4. Organization And Management Control (82701)

Pursuant to 10 CFR 50.47(b)(1) and (16), Section IV.A of Appendix E to 10 CFR Part 50, and REP Sections 2 and 7, this area was inspected to determine the effects of any changes in the licensee's emergency organization and/or management control systems on the emergency preparedness program and to verify that such changes had been properly incorporated into the REP and EIPs.

The organization and management of the emergency preparedness program were reviewed. The position of Emergency Planning Coordinator was assigned to a different individual in October 1987. The present Emergency Planning Coordinator had over five years of experience as a licensee employee in the Health Physics area. He recently attended a formal course on the conduct of the annual emergency preparedness program audit required by 10 CFR 50.54(t). Attendance at other courses pertinent to emergency planning was expected to be scheduled in the near term. According to licensee representatives, there were no significant changes in the organization and staffing of the offsite support agencies since the inspection of March 1987.

No violations or deviations were identified.

5. Training (82701)

Pursuant to 10 CFR 50.47(b)(2) and (15), Section IV.F of Appendix E to 10 CFR Part 50, and REP Section 7, this area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities.

The inspector reviewed the description (in REP Section 7) 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 1987 were reviewed. The training records revealed that the type, amount, and frequency of training were consistent with approved procedures.

The inspector conducted a walk-through evaluation with an individual who was on-shift as Plant Supervisor-Nuclear. During the walk-through, this individual was given various hypothetical sets of emergency conditions and data and was asked to talk through the response he would make if such an emergency actually existed. The individual demonstrated excellent familiarity with the REP and EIPIS. No problems were observed in the areas of emergency detection and classification, notifications, and protective action decision-making.

No violations or deviations were identified.

6. Independent Reviews/Audits (82701)

Pursuant to 10 CFR 50.47(b)(14) and (16), 10 CFR 50.54(t), and REP Section 7, this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program, and whether the licensee had a corrective action system for deficiencies and weaknesses identified during drills and exercises.

Records of audits of the program showed that an independent audit was conducted by the Quality Assurance Department during the period August 4 - September 16, 1987, and was documented in Report No. QAO-PTN-87-854. A second QA audit, documented in Report No. QAS-EMP-88-1, comprised observation of the licensee's interfaces with State and local government agencies as displayed during the February 1988 exercise. Audit findings and recommendations were presented to plant and corporate management.

The REP and procedure EP-20113 required critiques following exercises and drills. Licensee records showed that critiques were held following periodic drills as well as annual exercises, that deficiencies and weaknesses were discussed in the critiques, and that recommendations for corrective action were made.



The licensee's program for follow-up action on findings from audits, drills, and exercises was reviewed. Findings from NRC inspections and QA audits were included in a plant-wide tracking system known as CTRAC. Findings from the licensee's exercises and drills were entered into the Emergency Planning Commitment Tracking System Report, which was developed to address an item from a previous NRC inspection. The latter report showed that 34 of 59 licensee-generated findings from the 1987 exercise were closed as of June 8, 1988. The licensee was actively pursuing resolution of the others. The same report listed 33 items from the February 1988 exercise. Although most of these were open, appropriate corrective actions were proposed and assigned. In summary, the licensee's management of follow-up on self-identified emergency preparedness items was found to be considerably better focused than in March 1987.

No violations or deviations were identified.

7. Action On Previous Inspection Findings (92701)

(Closed) Inspector Follow-up Item 250,251/88-01-06: Performing new comparison with NRC and State dose assessment models after code correction of licensee model. Following issuance of the inspection report, information was provided to the NRC by one of its consultants which revealed that there was no factual basis for this finding.

8. Exit Interview

The inspection scope and results were summarized on June 9, 1988, with those persons indicated in Paragraph 1. Although proprietary information was reviewed during this inspection, none is contained in this report.