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ACCESSION NBR:8909200244 DOC.DATE: 89/09/13 NOTARIZED: NO DOCKET #
FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
AUTH.NAME AUTHORITY AFFILIATION
LYONS,E. Florida Power & Light Co.
WOODY,C.O. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-012-00:on 890707,source surveillances required by
Tech Spec missed due to inadequate administrative controls.
W/8 ltr.

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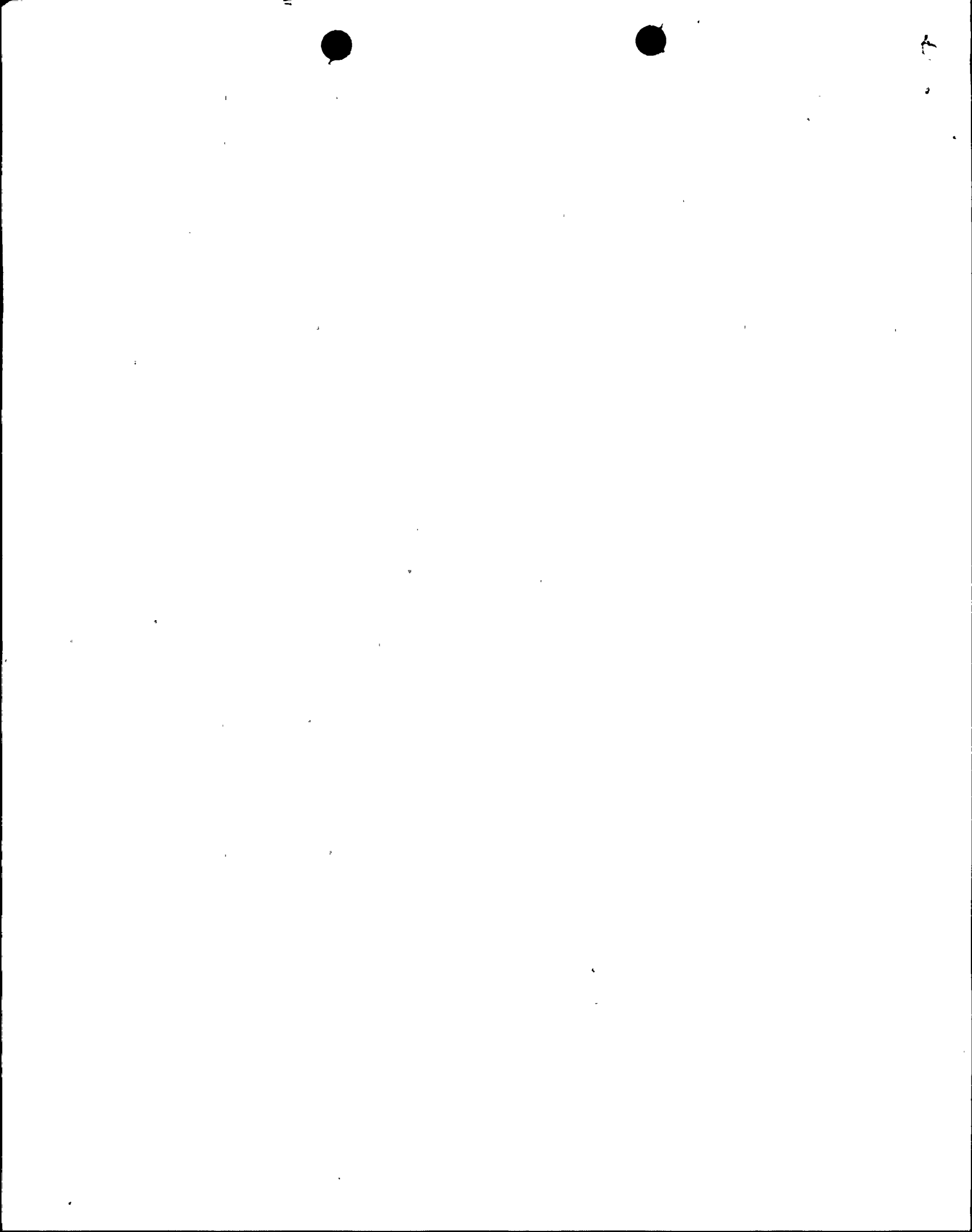
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P. Box 14000, Juno Beach, FL 33408-0420

SEPTEMBER 13 1989

L-89-336  
10 CFR 50.73

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket No. 50-250 and 50-251  
Reportable Event: 89-12  
Date of Event: July 7, 1989  
Source Surveillances Required by Technical Specification  
3.11 and 4.13 Missed Due to Inadequate Administrative Controls

The attached Licensee Event Report (LER) is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very truly yours,

C. O. Woody  
Acting Senior Vice President - Nuclear

COW/JRH/cm

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Turkey Point Unit 3</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 2 5 0</b>	PAGE (3) <b>1 OF 0 13</b>
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TITLE (4)  
**Source Surveillances Required by Technical Specifications 3.11 and 4.13  
Missed Due to Inadequate Administrative Controls**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
07	07	89	89	012	00	09	13	89	Turkey Point Unit 4		0 5 0 0 0 2 5 1
											0 5 0 0 0

OPERATING MODE (9) <b>1</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10) <b>1,00</b>	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)						
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)						
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
	<input type="checkbox"/> 20.406(a)(1)(vi)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)							

LICENSEE CONTACT FOR THIS LER (12)	
NAME <b>Ed Lyons - Regulation and Compliance Engineer</b>	TELEPHONE NUMBER AREA CODE <b>3 0 5</b> NUMBER <b>2 4 6 - 6 7 3 1</b>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)			<input checked="" type="checkbox"/> NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On July 7, 1989, with Unit 3 and Unit 4 in Mode 1 at 100%, Health Physics personnel (non-licensed utility personnel) discovered a liquid Scintillation Counter with an internal calibration source that had not been leak tested as required by Technical Specifications (TS) 3.11 and 4.13. The subject Cesium-137 calibration source has an activity of 30 microcuries. TS 3.11 requires those quantities of by-product material that exceed the quantities listed in 10CFR30.71 are to be leak tested in accordance with the schedule described in TS 4.13. The required leakage tests have not been performed, since receipt of the subject liquid Scintillation Counter in June, 1987. This LER is being submitted late, since the appropriate personnel were not notified of the incident until August 16, 1989. The subject Cesium-137 calibration source passed a leak test conducted on July 9, 1989. On June 30, 1989, Administrative Procedure, O-ADM-022, "Procuring Radioactive Sources," was issued. This procedure administratively controls the procuring of all radioactive sources (except fuel), and requires all shippers to indicate on the outside of the package if the package contains radioactive material. The individual responsible for the tardiness of this LER has been counseled.



FACILITY NAME (1)  Turkey Point Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   2   5   0	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8   9	-   0   1   2	-   0   0	0   2	OF 0   3

TEXT (If more space is required, use additional NRC Form 368A's) (17)

Event

On July 7, 1989, Health Physics (non-licensed utility personnel) discovered a liquid Scintillation Counter with an internal calibration source that had not been leak tested as required by Technical Specifications 3.11, "Miscellaneous Radioactive Materials Sources," and 4.13, "Radioactive Materials Sources Surveillance." The Cesium-137 internal calibration source has an activity of 30 microcuries. Technical Specification 3.11 requires those quantities of by-product material that exceed the quantities listed in 10CFR30.71 (Schedule B) be leak tested in accordance with the schedule described in Technical Specification 4.13. Since receipt of the subject liquid Scintillation Counter in June, 1987, the required tests for leakage have not been performed.

This report was not submitted within 30 days as required by 10CFR50.73(a) due to non-cognitive personnel error (non-licensed utility personnel) in that the appropriate personnel were not made aware of the incident until August 16, 1989.

Cause of the Event

The source delineated above fell under the Department of Transportation category of "Excepted Radioactive Materials," more specifically 49CFR173.422, "Exceptions for Instruments and Articles." This regulation indicates that shipments containing less than 100,000 microcuries of Cesium-137 as a component part of the instrument or article do not require any labeling on the outside of the package. For cases such as this, appropriate administrative controls to ensure that Health Physics personnel were notified upon receipt of the source did not exist. Therefore, Health Physics did not know the Cesium-137 internal calibration source existed on site.

Analysis of the Event

Although Technical Specifications 3.11 and 4.13 require the subject source to be tested for leakage, 10CFR31.5(c)(2)(ii) states that devices containing not more than 100 microcuries of other beta and/or gamma emitting material need not be tested for any purpose. In addition, the subject Cesium-137 calibration source passed a leak test conducted on July 9, 1989. Based on the above, this event had no effect on the health and safety of the public.

Corrective Actions

- 1) The Cesium-137 calibration source contained within the subject liquid Scintillation Counter passed a leak test conducted on July 9, 1989.

FACILITY NAME (1)  Turkey Point Unit 3	DOCKET NUMBER (2)  0 5 0 0 0 2 5 0	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 9	- 0 1 3	- 0 0	0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

- 2) Prior to the identification of this event, Administrative Procedure O-ADM-022, "Procuring Radioactive Sources," was issued on June 30, 1989. Except for fuel, this procedure administratively controls the procurement of all radioactive sources.
- 3) The individual responsible for the tardiness of this Licensee Event Report has been counseled on the requirements of plant procedures on event reporting and instructed on the appropriate mechanism to obtain an evaluation of the reportability of an event.
- 4) A memorandum will be issued to appropriate Health Physics personnel discussing the importance of obtaining an evaluation of the reportability of an event.

Additional Information:

No similar Licensee Event Reports were identified.