

October 31, 1994

*Official*

Florida Power and Light Company  
ATTN: Mr. J. H. Goldberg  
President - Nuclear Division  
P. O. Box 14000  
Juno Beach, FL 33408-0420

Gentlemen:

SUBJECT: REVISIONS 26 AND 27 TO RADIOLOGICAL EMERGENCY PLAN FOR TURKEY POINT PLANT, DOCKET NOS. 50-250 AND 50-251

Thank you for your response dated August 31, 1994 (L-94-221) to our letter of July 28, 1994, in which we requested additional information regarding certain changes in the subject submittals that appeared to be inconsistent with the emergency planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. We have evaluated your response and made the following determinations with respect to the two apparent inconsistencies delineated in the Enclosure to our previously referenced letter:

1. The issue regarding dose limits for licensee emergency workers is considered resolved, contingent upon fulfillment of your commitment to revise your Plan as indicated in your response. We request that appropriate modifications be provided to us in final form (i.e., as a revision to your Plan) within 45 days of the date of this letter.
2. We have not yet made a final determination regarding your use of the terms "total whole body dose" and "thyroid dose", respectively, as substitute terms for "total effective dose equivalent" and "thyroid committed dose equivalent". The acceptability of this substitute nomenclature is currently under review by the NRC's Office of General Counsel (OGC). We will inform you of our final determination on this matter once OGC issues its ruling (expected within approximately 60 days from the date of this letter).

The NRC's acceptance of the other changes made in Revisions 26 and 27 does not embrace the content of the current revision (July 1994) of the State of Florida Notification Message Form for Nuclear Power Plants, which was not included in either of these revisions to your Plan. (A previous edition of this form is exhibited as Table 4-2.) We realize that changes to the content of this form are negotiated with the State of Florida as well as Florida Power Corporation. We encourage you to continue working with those organizations to develop a form which is acceptable to all parties and, at the same time, is consistent with the NRC's regulatory guidance for reporting emergency information to State and local agencies. In previous telephonic discussions between D. Mothena of your staff and members of my staff, we have communicated to you the details of a format that would acceptably address NRC requirements and guidance for reporting information on projected doses to State and local authorities. This format includes integrated dose projections as well as

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reporting terminology that would "bridge the gap" between Part 20 nomenclature and the terminology that the State desires to use. We will formally review the changes to the State of Florida Notification Message Form when a revised version of the form is incorporated in your Plan.

Please be reminded that 10 CFR 50.54(q) requires that proposed changes which decrease the effectiveness of your Radiological Emergency Plan may not be implemented without application to and approval by the Commission. However, changes may be made without Commission approval if such changes do not decrease the effectiveness of the Plan, and the Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. If a change is made without approval, you should furnish copies in accordance with 10 CFR 50.54(q). Also, any changes to the Emergency Plan Implementing Procedures should be made in accordance with the requirements of Appendix E to 10 CFR Part 50.

Should you have any questions regarding this letter, please contact Mr. Kenneth P. Barr of our staff on 404-331-0335.

Sincerely,

William E. Cline, Chief  
Radiological Protection and  
Emergency Preparedness Branch  
Division of Radiation Safety  
and Safeguards

Docket Nos. 50-250, 50-251  
License Nos. DPR-31, DPR-41

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