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TO: Mr. George Lear
FROM: FPL
Miami, FL. 33101
Robert E. Uhrig
DATE OF DOCUMENT: 07-05-77
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DESCRIPTION: Advising that FPL's health physics should not require modification regarding NRC's 03-02-77 ltr. concerning Radiation Protection Criteria....

ACKNOWLEDGED

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2 pages

PLANT NAME: TURKEY POINT UNITS 3 & 4
jcm 07-11-77

ENCLOSURE

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July 5, 1977
L-77-206

Regulatory

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Office of Nuclear Reactor Regulation
Attention: Mr. George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Lear:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Radiation Protection Criteria

Your letter of March 2, 1977 listed six criteria regarding the activities "individuals qualified in radiation protection procedures" should be able to perform. We have considered the six criteria in a review of the health physics qualifications of Turkey Point plant personnel, FPL health physics practices, and current Turkey Point Technical Specification requirements in the health physics area.

Technical Specification 6.2.2.d requires that "an individual qualified in radiation protection procedures shall be on site when fuel is in the reactor". We do not interpret this specification as requiring the continuous presence of health physics personnel on site. We can meet the specification by requiring the continuous presence of personnel qualified to judge whether an abnormal situation constitutes a health physics hazard needing the attention of someone from the Health Physics Department. The training and requalification programs associated with the Senior Reactor Operator (SRO) license include sufficient classroom and field training in health physics and radiation protection practices and procedures to allow an SRO to satisfy the Technical Specification. An SRO is qualified by his training to perform approximately 90% of the criteria in your March 2 letter. The remaining 10% are considered routine health physics or radiation protection activities and are performed by health physics personnel during normal working hours.

The Health Physics Department provides personnel trained and qualified in health physics and radiation protection procedures for 15 of the 21 shifts in each week. All routine health physics activities are performed during these 15 shifts. In addition,

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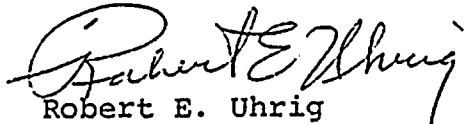
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Office of Nuclear Reactor Regulation
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health physics personnel are called to the site if they are not already on site whenever operating or maintenance activities require health physics coverage.

Our review has shown that the practices described above meet the intent of Technical Specification 6.2.2.d. They also meet the intent of 10 CFR 20 to maintain personnel exposure to ionizing radiation "as low as reasonably achievable". Since receipt of the Operating Licenses for Units 3 and 4, our health physics experience has been satisfactory, thus our health physics practices should not require modification.

Very truly yours,


Robert E. Uhrig
Vice President

REU/MAS/cpc

cc: Mr. Norman C. Moseley, Region II
Robert Lowenstein, Esquire