

APPENDIX A

NOTICE OF VIOLATION

Florida Power Corporation

License No. DPR-72

Based on the results of the NRC inspection conducted on December 5-9, 1977 and January 11-12, 1978, it appears that certain of your activities were not conducted in full compliance with NRC regulations and License Conditions as indicated below. These items have been categorized as described in our correspondence to you dated December 31, 1974.

Technical Specification 6.8.1.e requires written procedures to be established, implemented, and maintained covering Emergency Plan implementation.

- A. Emergency Plan Section 3.1.1, states the Emergency Coordinator shall call appropriate individuals or agencies listed in the Emergency Roster. Section 4.5.4.c of the Emergency Plan specifies action to be initiated when an unplanned release exceeds  $1.2 \times 10^{-7}$  uCi/cc.

Contrary to the above:

1. Emergency Procedure EM-206, "Emergency Plan Roster and Notification," did not have current Emergency Roster Call List telephone numbers on December 5, 1977.
2. Emergency Procedure EM-203, "Classification of Emergencies and Criteria for Evacuation," did not implement Section 4.5.4.c of the Emergency Plan.

This is an infraction.

- B. Emergency Plan Sections 1.0, 4.6.2.7.c, 6.1, and 6.3 specify equipment and applicable materials to be available at the Emergency Assembly Center (EAC), Fossil Plant Control Room, and Fossil Plant Water Laboratory.

Contrary to the above, on December 6, 1977, the following required equipment and applicable materials was not available:

1. Emergency Assembly Center (EAC)
  - (a) Copy of Emergency Plan
  - (b) Base Radio Station for communication on channel 1 with oil barge tug boats

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- (c) Portal monitor
  - (d) Decontamination Kit
  - (e) Emergency Environmental Survey Team Vehicle during backshift operation.
  - (f) Monitoring Kit 1 - High Range Instrument
- 2. Fossil Plant Control Room - copy of Emergency Plan
  - 3. Fossil Plant Water Laboratory - copy of applicable Emergency procedures.

This is an infraction.

Corrective action in providing the specified equipment and materials has been initiated. Therefore, the response to this item may be limited to the actions to be taken to avoid further noncompliance.

- C. Section 3.2.8 of the Emergency Plan specifies that the Crystal River Fire Brigades shall be self-reliant, requiring no offsite support. Emergency Procedure EM-216, "Duties of the Nuclear Plant Fire Brigade," Section 3.4 states that each Fire Brigade should consist of persons who have received specified training. Section 1.2 states the Nuclear Plant Fire Brigade will implement actions to effectively handle the fire emergency.

Contrary to the above, on December 5-8, 1977, backshift staffings of the Fire Brigade were composed of two shifts where only one Fire Brigade member was present onsite.

This is an infraction.

Corrective actions, as discussed in the Region II letter of December 15, 1977, have been implemented. Therefore, the response to this item may be limited to the actions to be taken to avoid further noncompliance.

- D. Section 2.2.3 of the Emergency Plan requires an Environmental Survey Team and a Radiation Survey Team. Section 7.2 of the Emergency Plan states that, through training, the personnel shall maintain a high proficiency in radiation protection including emergency monitoring.

Contrary to the above, on December 14, 1977, only one technician was present onsite during backshift on weekends, to staff the Environmental Survey Team and Radiation Survey Team; and periodically this technician position was staffed with an individual who had not completed training in Emergency Procedures EM-208 and EM-210.

This is an infraction.

- E. Emergency Plan Sections 7.3.b and 7.3.c.1 require quarterly medical drills and semi-annual Class A and B drills.

Contrary to the above, the licensee has not performed these drills since issuance of the operating license.

This is an infraction.

- F. Technical Specification 6.8.1.a requires written procedures to be implemented for the procedures recommended in Appendix A of Regulatory Guide 1.33. Appendix A, of Regulatory Guide 1.33, Section J, specifies radiochemical laboratory instrumentation calibration procedures shall be established. Crystal River Surveillance Procedure SP-707, Section 6.2, requires weekly resolution determinations of the GeLi gamma spectroscopy system.

Contrary to the above, resolution determinations of the GeLi gamma spectroscopy system was not performed during the weeks of October 31 and November 15, 1977.

This is a deficiency.