



SUPPLEMENTAL INFORMATION

1. Report No: 80-031/04L-0
2. Facility: Crystal River - Unit 3
3. Report Date: August 25, 1980
4. Occurrence Dates: June, July 1980 (discovered July 25, 1980)  
(determined at plant August 6, 1980)

5. Identification of Occurrence:

Contrary to Appendix B (Environmental) Technical Specification 5.5.1, explicit written procedures were not adhered to for operation of all systems and components involved in carrying out the environmental monitoring programs.

6. Conditions Prior to Occurrences: N/A

7. Description of Occurrence:

Audits by the FPC Quality Programs Department (pursuant to Environmental Technical Specification 5.3.9.c) of the contractors that perform portions of the environmental monitoring program, revealed that, in all cases, these contractors were not adhering to their written procedures. These audits were Audits ETS-110, 111, 112 and 113 performed on Connell, Metcalf, and Eddy; State of Florida, Department of Health and Rehabilitative Services; University of Florida, Department of Engineering Services, Dr. H. T. Odum; and University of Florida, Department of Engineering Services, Dr. W. E. Bloch.

Audit Finding 110-1: Failure to adjust time of commencement of days sampling to a given angle of the sun on a seasonal basis.

Audit Finding 110-4: Polychaetes samples not completed with all information required. No locations and dates.

Audit Finding 110-5: Failure to revise procedure to reflect current QA/QC committee membership list.

Audit Finding 110-6: Annual report does not contain independent review.

Audit Finding 111-1: Index of procedures has not been updated to current level of revision.

Audit Finding 112-1: Biweekly sampling schedules are not within prescribed limits.

Audit Finding 113-1: Calculations for time on sample C43 was not considered. TLD QC logbook reflects shorter time.

Audit Finding 113-2: C41 samples from FPC do not have complete documentation on 10/26/79 and 11/2/79.

8. Designation of Apparent Cause:

Audit Finding 110-1: Sample times were not based on criteria in the procedures.

Audit Finding 110-4: Portions of voucher collection have been relabelled to meet procedures but the Polychaetes were not completed.

Audit Finding 110-5: The new members were approved by FPC but the procedures have not been revised.

Audit Finding 110-6: The independent review of the annual report was not completed by the specified individual.

Audit Finding 111-1: The index of procedures is only updated from time-to-time, but not for every revision.

Audit Finding 112-1: The biweekly sample schedules were based on an incorrect definition of surveillance interval.

Audit Finding 113-1: The TLD QC logbook for each month in the quarter was not checked for all short time periods.

Audit Finding 113-2: The documentation for C41 samples was not completed by FPC personnel.

9. Analysis of Occurrence:

Audit Finding 110-1: The personnel performing the sampling did not follow their procedures as to the adjustment of the days of sampling to a given angle of the sun on a seasonal basis.

Audit Finding 110-4: Portions of the voucher collection were being relabelled to meet the procedures and the Polychaetes had not been completed.

Audit Finding 110-5: The procedures had not been revised even though FPC had approved the changes.

Audit Finding 110-6: The individual specified to independently review the annual report did not do so.

Audit Finding 111-1: The index was not considered part of the procedures and as such was not updated with each revision.

Audit Finding 112-1: The contractor considered the surveillance interval to be from the end of the last surveillance to the beginning of the next surveillance.

Audit Finding 113-1: The TLD QC logbook was not checked for possible shorter time periods of TLD deployment.

10. Corrective Actions:

Audit Findings 110-1, 110-4, 110-5 and 110-6: Corrective actions have not yet been established.

Audit Finding 111-1: Procedures will be revised to require that an updated index be sent with each transmittal of revised procedures.

Audit Finding 112-1: Corrective actions have not yet been established.

Audit Finding 113-1: Procedures will be revised to require the Project Manager to check the TLD QC logbook to ensure that proper times are given for each TLD.

Audit Finding 113-2: A memorandum has been developed and will be sent to FPC when sample documentation is not completed. This memo will identify the missing documentation so that it may be completed and returned to the contractor.

11. Failure Data:

This is the first occurrence of this type.