



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

DEC 23 1980

In Rep'y Refer To:
RII:JMP
50-302/80-25

1981 JAN 5 PM 2 47
REGISTRATION SERVICES
BRANCH

Florida Power Corporation
Attn: J. A. Hancock, Assistant
Vice President
Nuclear Operations
P. O. Box 14042, Mail Stop C-4
St. Petersburg, FL 33733

Gentlemen:

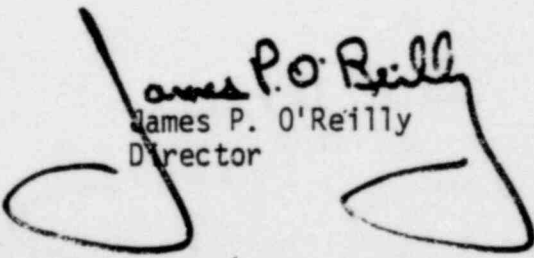
Thank you for your letters of September 30 and October 22, 1980, informing us of steps you have taken to correct the items of noncompliance concerning activities under NRC Operating License No. DPR-72 brought to your attention in our letter of September 8, 1980. The September 30 letter also outlined steps you have taken in response to the Notice of Significant Appraisal Findings. We will examine your corrective actions and plans during subsequent inspections.

With regard to Item B.b of the Notice of Violation, 10 CFR 20.103(a)(3) states that, as appropriate, licensees shall use measurements of radioactivity excreted from the body, or any combination of such measurements as may be necessary for timely detection and assessment of individual intakes of radioactivity by exposed individuals. Your supplemental response of October 22, 1980 describes actions you have taken in this area of concern. We believe these actions provide the appropriate measurement required by the regulation and we will examine them during future inspections.

With regard to your response to Items F and G, review of additional information provided in the October 22 submittal leads us to concur with your position on these items. The information provided in your supplemental response indicates that Item F did not constitute noncompliance. Items G.a and G.b also did not constitute noncompliance based on the information provided in your letter of September 30. Item G.c will be combined with Item E as an additional example of failure to post in accordance with 10 CFR 20.203. We will take appropriate action to amend our records to reflect these changes.

We appreciate your cooperation with us.

Sincerely,


James P. O'Reilly
Director

cc: D. C. Poole, Nuclear
Plant Manager

8101100842



October 22, 1980
3-0-3-a-2
CS-80-252

Mr. J. P. O'Reilly, Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 3100
Atlanta, GA 30303

Docket No. 50-302
Licensee No. DPR-72
Ref.: RII:RWZ
50-302/80-25

Dear Mr. O'Reilly:

In accordance with your request, we offer the following supplemental responses to the apparent Items of Noncompliance identified as items B(b), F, and G in the referenced inspection report.

B(b) Supplemental Response: Procedural revisions have been made to RP-102, "Respiratory Equipment Manual, Revision 9" and RP-208, "Bioassay Sampling Procedure, Revision 1" requiring all personnel assigned to the Crystal River Unit #3 respiratory program to have a baseline whole body count prior to initial respiratory assignment. Additionally, termination whole body counts will be provided for respirator wearers whenever possible. If an individual fails to present himself before departure, an explanation of that fact will be added to his exposure record. All personnel dosimetered after November 1980 will be informed of this policy during the badging process.

We are presently in compliance with our new baseline counting requirements. Full implementation of termination counting requirements will be accomplished by November 1, 1980

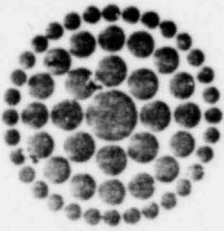
F. Supplemental Response: As referenced in our response to Appendix B, item F, dated 9-30-80, we indicated that air samples were taken in the vicinity of the workers in question. Copies of these samples have been included as an attachment to this correspondence for your to H/P technicians and procedural require better definition as to n, i.e., reference RWP number taken in vicinity of workers.

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**Florida
Power**
CORPORATION

September 30, 1980
3-0-3-a-2
CS-80-226

Mr. J. P. O'Reilly, Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 3100
Atlanta, GA 30303

Docket No. 50-302
Licensee No. DPR-72
Ref: RII:RWZ
50-302/80-25

Dear Mr. O'Reilly:

We offer the following responses to the items identified as significant appraisal findings of Appendix A, and the apparent items of noncompliance of Appendix B in the referenced inspection report.

Appendix A
NOTICE OF SIGNIFICANT APPRAISAL FINDINGS

A. An adequate Respiratory Protection Program, from training to use did not exist. The importance of this significant appraisal finding is underscored by the number of noncompliance items listed in Appendix B (Items A, B, and F) which relate to the Respiratory Protection Program (Sections 7 and 9).

A. Response: Some corrective action has been taken to upgrade our Respiratory Protection Program as of this date. This action includes current economic and safety evaluation of feasibility for purchase of a respiratory fitting chamber, interim assignment of a Health/Physics technician to the Training Department, permanent assignment of a Health/Physics Training Instructor by October 6, 1980, and addressing several Inspector Followup Items in a proposed procedural revision.

Additionally, two trips have been completed to other nuclear facilities for the purpose of whole body counts evaluation. Documentation is being prepared to facilitate Inspector Followup action.

The commitments made for development of a new Respiratory Protection Training program which would maintain the proficiency of all personnel trained by October 1, 1981 and program review by November 30, 1980 remain unchanged. Listed as infractions are addressed in our

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program which would maintain the proficiency of all personnel trained by October 1, 1981 and program review by November 30, 1980 remain unchanged. Listed as infractions are addressed in our

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