

FEB 01 1982

Docket Nos. 50-250 and 50-251

Florida Power and Light Company
ATTN: Dr. R. E. Uhrig, Vice President
Advanced Systems and Technology
P. O. Box 529100
Miami, FL 33152

Gentlemen:

SUBJECT: EMERGENCY PREPAREDNESS APPRAISAL

To verify that licensees have attained an adequate state of onsite emergency preparedness, the Office of Inspection and Enforcement is conducting special appraisals at each power reactor site. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives of the appraisal at each facility are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual applicant and licensee action to correct deficiencies and effect improvements, but also for effecting improvements in NRC requirements and guidance.

During the period of October 26 - November 6, 1981, the NRC conducted an appraisal of the emergency preparedness program at the Turkey Point Nuclear Station Units 3 and 4. Areas examined during this appraisal are described in the enclosed report (50-250/81-24, 50-251/81-24). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, and interviewed personnel.

Emergency preparedness deficiencies identified during this appraisal, for which you have made acceptable commitments to resolve, were discussed in our confirmatory letter (Appendix A) dated November 13, 1981. You are requested to report, in writing, to the Region II Office when all corrective actions identified in the confirmatory letter of November 13, 1981 have been completed. If the deficiencies addressed in the confirmatory letter are not corrected by the commitment dates enforcement action will be considered.

Further review of this emergency preparedness appraisal also indicates that there are other areas that should be evaluated and considered for improvement in your emergency preparedness program. These areas are discussed in Appendix B, "Emergency Preparedness Improvement Areas."

We recognize that an explicit regulatory requirement pertaining to each item identified in Appendix B may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty (30) days of the date of

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this letter, describing the results of your consideration of each of the items in Appendix B. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

In conjunction with the aforementioned appraisal, the emergency plan for your facility was reviewed. The results of this review, discussed in the attachment to the enclosed report, indicate that certain areas are not properly addressed in your emergency plan. Your corrective actions are to be incorporated into the Site Emergency Plan and procedures as appropriate. The plan changes for correcting each deficiency are to be provided to this office upon issuance or, at the latest, within 120 days of the date of this letter. Copies of these changes are to be submitted in accordance with the procedures delineated in 10CFR50.54(q).

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1).

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this appraisal, we will be pleased to discuss them with you.

Sincerely,



James P. O'Reilly
Regional Administrator

Enclosures:

1. Appendix A, Confirmation of Action Letter November 13, 1981
2. Appendix B, Emergency Preparedness Improvement Areas
3. Office of Inspection and Enforcement
Inspection Report Nos. 50-250/81-24 and 50-251/81-24

cc w/encl:

H. E. Yaeger, Site Manager

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bcc w/encl:

NRC Resident Inspector

Document Management Branch

State of Florida

Division of Emergency Preparedness, IE:HQ

OIE:DEP

RII

CRMcfarland:ejw

1/28/82

RII

GRJenkins

1/29/82

RII

LD Brownlee

1/29/82

RII

FCPagano

1/28/82

RII

JPSchohr

1/29/82

2nd sentence in
3rd para is redundant.
HED
Not problem

APPENDIX B

EMERGENCY PREPAREDNESS IMPROVEMENT AREAS

Based on the results of the NRC's appraisal of the Turkey Point Nuclear Plant Emergency Preparedness Program, conducted on October 26-November 6, 1981, the following items should be considered for improvement. (References are to sections in OIE Report Nos. 50-250/81-24, 50-251/81-24).

1. Designating the Site Emergency Planning Coordinator to be a member of the Plant Nuclear Safety Committee (1.0).
2. Including in the training program for site emergency planners an opportunity to attend seminars and meetings by industry groups (1.0).
3. Correcting the inconsistencies in the Plan and procedures regarding the retraining schedules for the emergency organization personnel (3.1).
4. Centralizing the training program in order to improve management control (3.1).
5. Assuring that the areas of offsite dose assessment and recommended protective actions are thoroughly covered in the course content and exams for the operations personnel (3.1).
6. Annually retraining general employees (3.1).
7. Developing an approved, formal lesson plan for each lesson (3.1).
8. Developing instructor standards for Supervisors and Team Leaders (3.1).
9. Making provisions to ensure the operability of communication equipment in the Interim TSC (4.1.1.2).
10. Providing protective clothing for TSC personnel (4.1.1.2).
11. Providing easily readable status display boards in the Interim TSC (4.1.1.2).
12. Indicating in EP-20105 an OSC supervisor and the related responsibilities (4.1.1.3).
13. Providing a specific listing of personnel expected to report to the OSC (4.1.1.3).
14. Establishing an alternate OSC that provides personnel protection from direct radiation and airborne contaminants (4.1.1.3).

15. Providing specific instructions for those personnel who are required to report to the IEOF (4.1.1.4).
16. Developing an implementing procedure for the operation of the mobile van (4.1.1.9).
17. Equipping the mobile van with sample analysis equipment necessary to perform its mission (4.1.1.9).
18. Improving the assembly area with respect to the capacity for accommodating the number of persons expected (4.1.2.1).
19. Providing an alternate offsite assembly area (4.1.2.1).
20. Providing a procedure for emergency duties at the assembly area (4.1.2.1).
21. Augmenting the medical treatment capability to include a nurse, a dedicated area, and arrangements for admitting external medical support vehicles and personnel onsite (4.1.2.2).
22. Developing procedures for the administration of a KI program (4.1.2.2).
23. Making provisions for personnel decontamination of radiodine and more persistent contamination cases (4.1.2.3).
24. Making provisions for the collection and disposal of liquid radioactive waste at the Florida City Substation (4.1.2.3).
25. Developing a general procedure to coordinate all of the various decontamination activities at the Florida City Substation (4.1.2.3).
26. Developing more definitive plans for the expanded support facilities (4.1.3).
27. Providing additional space for news media at the nearsite media center and providing additional telephone service at the National Guard Armory media center (4.1.4).
28. Providing the mobile van with an emergency kit containing appropriate emergency personnel equipment and instruments (4.2.1.1).
29. Improving the quality of some of the items in the emergency kits (4.2.1.1).
30. Providing back-up sampling equipment for the Unit 3 Spent Fuel Pit exhaust NMC monitor (4.2.1.2).
31. Relocating the meteorological system recorder in the Control Room so as to be easily read and interpreted (4.2.1.4).

32. Detailing the meteorological procedure to address the land-sea effects (4.2.1.4).
33. Conducting a detailed study of the emergency respiratory protection requirements and capabilities (4.2.2.1).
34. Providing appropriate policy, guidance, and procedures to establish necessary emergency damage control/corrective action (4.2.4).
35. Designating a location(s) and appropriate emergency equipment and supplies for reserve storage (4.2.5).
36. Providing specific vehicles for transportation of the Emergency Response Teams (4.2.6).
37. Correcting the procedural deficiencies and inconsistencies in the emergency health physics procedures (5.1).
38. Revising EP-20126 to incorporate wind direction in degrees and to incorporate a comment on the air ejectors contribution to releases (5.4.2).
39. Developing the capability for rapid determination of field sampling results (5.4.2.1).
40. Modifying the offsite survey procedures to specify the use of respirators, dosimeters, and protective clothing for the offsite monitoring teams (5.4.2.1).
41. Modifying the onsite survey procedures to include more detailed response requirements (5.4.2.2).
42. Modifying in plant survey procedures to include special precautions for the support of emergency operations (5.4.2.3).
43. Identifying specific locations on the containment wall where measurements are to be made to determine when an EAL is achieved (5.4.2.3).
44. Specifying the use of silver zeolite filters in the procedures for effluent gas monitoring (5.4.2.4-5.4.2.11).
45. Including in all postaccident sampling and analysis procedures instructions for shielding, labeling, and disposition of samples (5.4.2.4-5.4.2.11).
46. Identifying the person to whom the sample analysis data is given (5.4.2.4-5.2.4.11).
47. Amending HP-23 to include provisions to process environmental TLD's during emergencies (5.4.2.12).

48. Making whole body emergency exposure dose for lifesaving action listed in the Plan and the various procedures consistent (5.4.3.1).
49. Establishing guidelines that include thyroid doses in emergency exposure doses (5.4.3.1).
50. Clearly marking evacuation routes (5.4.3.2).
51. Conducting a drill to test the ability of the First Aid/Rescue Team to remove an injured person from some of the more difficult places in the plant (5.4.3.5).
52. Providing guidance for security personnel at the assembly area (5.4.4).
53. Providing access and egress guidance during prolonged site evacuations (5.4.4).
54. Providing a coordinated program for rumor control (5.4.7).
55. Modifying HP-90 to clarify the inventory frequency, and to include inventory sheets (5.5.1).
56. Correcting discrepancies in the coordination and administration of the onsite drill program (5.5.2).
57. Expanding the requirements for the conducting of HP drills to include those referenced in NUREG-0654 (5.5.2).
58. Ensuring the documentation of all drills (5.5.2).
59. Reviewing at least annually the procedures that implement the Plan (5.5.3).
60. Incorporating into the Plan and EPs the use of or availability of QA/QC personnel in observing drills/exercises (5.5.4).
61. Providing for an annual update of information and to familiarize the news media with the facility (6.3).

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

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Florida Power and Light Company
ATTN: Dr. R. E. Uhrig, Vice President
Advanced Systems and Technology
P. O. Box 529100
Miami, Florida 33152

Gentlemen:

Subject: Confirmation of Action

This refers to a telephone conversation on November 10, 1981, between Mr. J. Williams, Director Nuclear Energy, and Mr. R. C. Lewis of this office, concerning our appraisal of your emergency preparedness program for the Turkey Point facility. Our findings were also discussed on November 6, 1981, with Mr. C. O. Woody and other members of your staff during the exit briefing at the facility.

With regard to the matters discussed, it is our understanding that you will undertake the following actions to resolve apparent deficiencies in your emergency preparedness program.

1. Dose assessment areas will be improved by the following actions:
 - a. Emergency Procedure No. 20126 will be revised by December 7, 1981, to include the following changes: use of the two meteorological towers; estimating the interval for dose projections; proper use of Table 1 (Dose Projection Worksheet); obtaining a 15-minute average of the meteorological data; obtaining meteorological data from Homestead AFB if the normally used recorder is inoperable; and completion of Table 4 of the procedure.
 - b. Table 2 of the Emergency Procedure No. 20103 will be revised by December 7, 1981, so as to reference or contain specific Technical Specifications requirements instead of the present general references.
 - c. Procedure HP-91 will be revised by December 7, 1981, to include techniques for plume monitoring by the offsite monitoring team.
 - d. The interface between the off-normal operating procedures and the emergency procedures will be strengthened by February 8, 1982.
 - e. Training will be accomplished by February 19, 1982, on dose assessment procedures and procedures for recommending protective actions for the offsite population.

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PDR [signature]*

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2. Provisions will be established by December 31, 1981, for dissemination of information to the public including annual updates. Accordingly, a revision of the Turkey Point Plant Emergency Plan will be made by February 15, 1982.
3. Shift staffing and augmentation capability will be upgraded to meet the guidance given in Table B-1 to NUREG-0654, or a submittal of alternative methods will be provided to the NRC by November 23, 1981.

Should you not be in agreement with the understandings, as documented in this letter, please contact this office immediately. Upon final completion of all these actions, you are requested to provide this office with written confirmation of that fact.

Sincerely,

James P. O'Reilly
Regional Administrator

cc: H. E. Yeager, Site Manager