

USNRC REGION II
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**Florida
Power**

October 1, 1982
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File: 3-0-3-a-2

Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 3100
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 82-10
Supplemental Response

Dear Mr. O'Reilly:

By letter dated August 2, 1982, Florida Power Corporation (FPC) provided a response to Inspection Report 82-10. The following provides a rewording of our August 2, 1982 response, with changes identified by change bars, and the result of our management reviews requested by your report.

A. VIOLATION

Technical Specification 6.11 requires procedures to meet the requirements of Title 10, Code of Federal Regulations, Part 20, be adhered to for all activities involving personnel radiation exposure.

Radiation Protection Procedure, RP-101, Section 4.8.2, requires an individual entering a contaminated area to wear proper clothing necessary for contamination control as specified by a Standing Radiation Work Permit (SRWP).

Contrary to the above, on May 5, 1982, two individuals were observed on separate occasions entering a contaminated area without the proper clothing requirements specified on the SRWP.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

Florida Power Corporation concurs with the stated violation. The cause of this event is failure to adhere to procedure.

After the incident occurred, the Chemistry/Radiation Protection Section (Chem/Rad) removed one individual's qualification for access into the Radiation Controlled Area (RCA) and requested retraining.

Mr. J. P. O'Reilly
#3F-1082-01
Page -2-

The Nuclear Operations Training Department provided a special class and written test on compliance to Radiation and Standing Radiation Work Permits and general radiation protection practices. Satisfactory results were obtained from the test, and the individual was allowed access to the RCA.

In order to avoid further violations of the Radiation Protection Program and to determine whether this is a generic problem or an isolated case, Chem/Rad management has implemented a program of increased surveillance by Health Physics Supervisors within the RCA. If generic implications are found, Management will take corrective actions to eliminate further items of non-compliance. Results of the study should be completed by September 1, 1982. Florida Power Corporation, therefore, requests extension until October 1, 1982 to address any improvements to Management Control Systems.

SUPPLEMENTAL RESPONSE

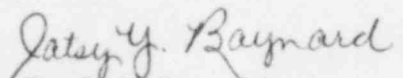
In order to determine whether or not this was a generic problem or an isolated case, on May 19, 1982, Chem/Rad implemented a formal program of increased surveillance by Health Physics Supervisors within the RCA. The program appears to have identified that the problem was an isolated case, rather than generic. However, the visibility of supervision within the RCA seems to have had a positive effect on the workers' attitude regarding compliance with the Radiation Protection Program.

FPC management will continue to keep abreast of workers attitudes concerning the program. Based on this and other contributing factors, such as varying activity levels, management will continue to make appropriate recommendations regarding the continuation and magnitude of the surveillance program necessary to avoid further items of non-compliance.

However, we are somewhat hesitant to establish more of a policing role for Health Physics (HP) than is absolutely necessary. We consider it essential that HP personnel be viewed more as co-workers than auditors and have so emphasized. We intend to further emphasize that it is the responsibility of supervisory personnel and not HP to assure compliance with Radiation Work Permits and other HP/ALARA requirements. This philosophy is consistent with the recommendations of the various Regulatory Guides, NUREG's and Reports on the subject.

Should there be further questions, please contact this office.

Very truly yours,


Dr. P. Y. Baynard
Assistant to Vice President
Nuclear Operations

EF/mlg

cc: Document Control Desk