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August 2, 1982 #3F-0882-03 File: 3-0-3-a-3

Mr. J. P. O'Reilly, Regional Administrator 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

Dear Mr. O'Reilly:

Florida Power Corporation hereby submits its response to the item of non-compliance identified in the subject Inspection Report. Please be advised that this response was due on July 18, 1982. However, we have been unable to locate evidence the required response was forwarded to you. Therefore, this response is submitted in its place. Redundant tracking will be initiated to preclude this type of occurrence in the future.

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.

The two individuals involved were a supervisor and one of his subordinates. After the incident occurred, the Chem/Rad Section removed the supervisor's qualification for access into the Radiation Controlled Area (RCA) and requested retraining. The Nuclear

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> 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 will again be 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.

Should there be further questions, please contact this office.

Very truly yours,

David G. Hardis

David G. Mardis Acting Manager Nuclear Licensing

EF/mlg

cc: Document Control Desk