



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

Report No: 50-302/83-05

Licensee: Florida Power Corporation
3201 34th Street, South
St. Petersburg, FL 33733

Docket No: 50-302

License No: DPR-72

Facility Name: Crystal River

Inspection at Crystal River site near Crystal River, Florida

Inspectors: Blair O Kyo
for A. L. Cunningham

1 April 1983
Date Signed

Blair B Kyo
G. B. Kuzo

1 April 1983
Date Signed

Approved by: AY

D. M. Montgomery, Section Chief
Operational Programs Branch
Division of Engineering and Operational Programs

4/6/83
Date Signed

SUMMARY

Inspection on March 14 - 18, 1983

Areas Inspected

This routine, unannounced inspection involved sixty-two inspector-hours on site in the areas of radiological environmental monitoring including: management and administrative controls; status review of the radiological environmental monitoring program; inspection of selected monitoring and sampling stations; review of monitoring records and data compiled during January 1, 1982 to present; verification of placement of co-located TLDs deployed under the NRC TLD Direct Radiation Monitoring Network; review of the interlaboratory comparison and EPA Cross-Check programs; status review of the onsite meteorological measurements program.

Results

Of the seven areas inspected, no violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *R. Fuller, Licensing Specialist
- *L. A. Hill, Manager, Site Nuclear Services
- *E. M. Howard, Director Site Nuclear Services
- *B. J. Hickie, Chem/Rad Manager
- *C. G. Brown, Compliance Manager
- M. L. Unger, Quality Assurance Engineer
- R. Carbiener, Compliance Auditor
- G. Boldt, Nuclear Plant Engineering and Technical Services Manager

Other Organizations

- *E. Ford, Licensing Consultant, NUS

NRC Resident Inspector

- *T. F. Stetka

- *Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on March 18, 1983, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Enforcement Matters

(Closed) Violation (50-302/81-26-01): The item addressed the licensee's failure to submit supplementary reports to annual radiological environmental surveillance reports for calendar years 1979 and 1980, respectively. The inspector reviewed the supplementary data later submitted by the licensee. There were no further questions regarding the subject reports.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Management Controls

- a. Management and administrative controls defined in Section 5.0 of Appendix B Technical Specifications were reviewed by the inspector with respect to the following items: (1) organizational and management responsibility for implementation of the radiological environmental monitoring program; (2) environmental monitoring program procedures;

and (3) quality assurance including periodic audits and analytical quality control. These items are discussed below.

- b. The inspector conducted a comprehensive review, including discussions with cognizant licensee representatives, of existing corporate organization to determine the adequacy of specific management responsibility for assuring implementation of the radiological environmental monitoring program. Inspection disclosed that corporate and station organizational changes were implemented subsequent to the previous environmental protection inspection (IE Report 50-302/81-26). In accordance with the revised organizational structure, the Site Nuclear Services Manager is directly responsible for administration and coordination of off-site environmental radiological monitoring and associated radiochemical analyses. The supervisor of Radiological Support Services is responsible for assuring implementation of the monitoring program including development and issuance of routine and nonroutine reports associated with the program. The above supervisor reports directly to the Director of Site Nuclear Services. Inspection disclosed that organizational responsibility for management and implementation of the radiological environmental monitoring program was consistent with Appendix B Technical Specification requirements and conditions. There were no questions regarding this item.
- c. Appendix B Technical Specification 5.3.9 requires that audits of the following facility activities shall be performed at least once per twelve months, viz.: (1) implementation of the radiological environmental monitoring and surveillance programs; (2) conformance to procedures and RETS requirements; and (3) contractor radiological environmental monitoring and surveillance. The inspector conducted a detailed review of audits and respective checklists conducted subsequent to the previous environmental protection inspection (IE Report 50-302/81-26).

Audit findings and the required resolution thereof were discussed with cognizant licensee representatives. Audit No. QP-229 was conducted during September 7 - 16, 1982, and addressed the following items: conformance of monitoring and surveillance activities with RETS requirements; control of contractors providing environmental program services; limiting conditions for operations; and program reporting requirements. The subject audit disclosed conformance of program elements with Technical Specification requirements. Audit No. ETS-121 conducted on June 9, 1982, addressed RETS monitoring and surveillance conducted by the State of Florida Department of Health and Rehabilitative Services regarding the following items, viz.: data acquisition, handling and control; sampling instrument maintenance, calibration and reliability; quality assurance and quality control practices. The audit disclosed no adverse findings. Audit No. ETS-120 conducted on June 8, 1982, addressed program monitoring, sample analysis and reporting thereof, conducted by the University of Florida. The audit identified four nonconformances. Inspection disclosed that appropriate corrective actions were implemented. Inspection further disclosed that

audit findings were formally closed by the licensee. The inspector had no further questions regarding this item.

- d. Appendix B Technical Specification 5.5 requires that explicit written procedures, including applicable check lists and instructions, shall be prepared and adhered to for operation of all systems and components involved in carrying out the effluent release and environmental radiological monitoring programs. The specification further requires that each procedure and changes thereto shall be reviewed and approved prior to implementation. Inspection and review was limited solely to those procedures revised subsequent to the previous environmental protection inspection (IE Report No. 50-395/81-26). Inspection disclosed that Procedure No. AMI-01 - "Site Nuclear Services Department Procedure" Revision 1, was approved for implementation on December 2, 1982. Review of the existing organizational structure and responsibilities, and detailed discussions with cognizant licensee representatives confirmed that the subject procedure was followed as required to assure implementation of the radiological environmental program. There were no questions regarding this item.

6. Quality Control of Analytical Measurements

Radiological environmental monitoring samples are collected and analyzed by the University of Florida and the State of Florida Department of Health and Rehabilitative Services (DHRS) under contracts issued by the licensee. The subject contractors routinely furnish the licensee with information and data regarding quality control of analytical measurements which include intra-laboratory and interlaboratory cross-checks and comparisons. Inspection also disclosed that the licensee has recently implemented a computer based system to access environmental data and quality control checks conducted by the University of Florida under the above referenced contract. The licensee's radiological environmental surveillance quality assurance program includes periodic contractor audits which address contractor activities involving sample collection, analysis and analytical quality control, data handling and reporting as discussed in paragraph 5c, above. Selected comparative analytical data compiled by contractors on split and duplicate environmental samples compared favorably with equivalent data for such samples involved in on-going cross-check activities with NRC Region II. There were no questions regarding this item.

7. Status Review of Radiological Environmental Monitoring Program

- a. Technical Specification 3.2 defines the requirements for the radiological environmental monitoring program which include the following: (1) specific sampling/analytical parameters, locations, and schedules; (2) general and critical pathways monitored; (3) lower limits of detection (LLD) for required analytical parameters; (4) land use census requirements; and (5) reporting requirements as specified in Technical Specifications 5.6.1 and 5.6.2.

- b. Inspection included a review of program organization and management controls to assure that all program requirements were implemented as required by Technical Specifications. Inspection also included the following: (1) a review of sampling records and data compiled during the 1982 calendar year; (2) direct inspection of selected air particulate monitoring stations, C-46, C-41, C-07, C-26, C-18, C-04 and verification of required calibration of the monitors inspected; (3) inspection of selected ground water and precipitation monitoring stations; (4) inspection of licensee's TLDs stations; and (5) review and discussion of land census data with cognizant licensee representatives for calendar year 1982. Inspection disclosed that environmental sampling and reporting of results were consistent with requirements defined in Section 3.2 of the Technical Specifications. There were no questions regarding these items.

8. TLD Direct Radiation Network

Inspection was conducted to verify deployment of licensee TLDs co-located with NRC TLDs at selected stations in accordance with the NRC TLD Direct Radiation Monitoring Network program. The inspector noted that licensee TLDs were deployed at the five selected radiation monitoring stations assigned by the referenced program.

9. Status Review of On-Site Meteorological Measurements Program

Appendix A Technical Specification 3.3.3.4 requires operability of the meteorological instrumentation channels shown in Table 3.3-8 (wind speed, wind direction, and air temperature - ΔT , each located at nominal elevations of 33 feet and 175 feet, respectively). During the period between January 25, 1983 (0100 hours) and February 3, 1983 (1045 hours) wind direction, wind direction recorder, wind speed, and ambient temperature at 33 feet and 175 feet elevations were determined to be inoperable. These findings were the subject of nine nonconformance operating reports (NCORs) and were reported to the NRC in accordance with Technical Specification 6.9.1.9.6 as Licensee Event Report (LER) No. 83-005. There were no abnormal radiological releases during periods of instrument failures. The inspector noted however that meteorological instrument failures constituted a recurrent problem. The subject LER was the twenty-fifth report under Technical Specification 3.3.4. A detailed inspection and review of NCORs, LERs, and meteorological data recovery efficiency records for the period April 1980 through the present showed frequent recurrent instrument failures at both nominal elevations referred to above. These findings were discussed with licensee representatives who stated that a new onsite meteorological measurements facility will be sited in the vicinity of the percolation ponds and will be operational prior to the end of the current calendar year. Following additional discussions regarding corrective actions to preclude recurrent instrument failures, a licensee representative stated that a letter would be submitted to NRC-Region II, within two weeks of March 18, 1983, defining interim corrective actions designed to eliminate frequent instrument failures and upgrade meteorological data recovery efficiency. This item will be reviewed during subsequent inspections (302/83-05-01).