

JUL 13 1983

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Florida Power & Light Company
ATTN: Dr. R. E. Uhrig, Vice President
Advanced Systems and Technology
P. O. Box 14000
Juno Beach, FL 33408

Gentlemen:

SUBJECT: REPORT NOS. 50-250/83-06 AND 50-251/83-06

This acknowledges receipt of your June 1, 1983 letter and check for \$40,000 in response to our Notice of Violation and Proposed Imposition of Civil Penalty dated May 3, 1983.

We have reviewed your response to the violations described in the Notice of Violation and Proposed Imposition of Civil Penalty, including your corrective actions described therein. These actions will be examined during future inspections of your licensed program.

In your June 1, 1983 letter you made two comments regarding statements in the Notice of Violation and a third comment in which you described the extenuating circumstances regarding the missing evaluation of off-scale dosimeters.

The Notice of Violation was incorrect, as you commented, in that the exposed individuals were working in a high radiation area rather than a radiation area. However, the NRC inspection report did state the facts correctly.

Your second comment regarding the Notice of Violation stated that your Health Physics Department's evaluation of the potential exposure to steam generator workers "determined" that an overexposure would not have occurred. NRC does not question that the evaluation made such a final determination. However, the details contained in that evaluation revealed that the potential for an overexposure did exist. Our analysis of that potential was presented to FP&L management and staff at the enforcement conference on March 16, 1983. Paragraph 7 of the NRC inspection report describes the assigned exposure to one individual as 2845 millirem. The next administrative hold point for this person, based upon the information available prior to the inspector's intervention, would have permitted the individual to receive 120 additional uncorrected millirem. Utilizing the worst-case correction factor of 1.85, the potential additional exposure was 225 millirem and, added to the assigned 2845 millirem, the result exceeds the three-rem limit by 50 millirem.

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The extenuating circumstances regarding the missing evaluation of off-scale dosimeters were taken into consideration in determining the amount of the civil penalty. As our letter of May 3, 1983 noted, the licensee's performance in the radiation protection area was considered, and resulted in the determination to impose only the basic penalty - with no increase for multiple examples (25%) or for prior notification (25%).

Sincerely,

Jane A. Axelrad, Director
Enforcement Staff
Office of Inspection and Enforcement

~~IE:ES~~
EFlack
7/8/83

~~Telephone~~
ELD *K. Cys*
JLieberman
7/8/83

~~Telephone~~
RII ~~MPuckett~~
MPuckett
7/8/83

~~ES:JA~~
JAAxelrad
7/12/83

~~IE:DD~~
JHS ~~tezek~~
7/1/83

~~D:IE~~
RCDeYoung
7/1/83

Not necessary since I signed.

JUL 12 1983

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