

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point

Docket Nos. 50-250, 50-251
License Nos. DPR-31, DPR-41

The following violations were identified during an inspection conducted on January 16-18, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Section IV.B of Appendix E requires that a licensee's emergency plans shall include emergency action levels based on in-plant conditions and instrumentation in addition to on-site and off-site monitoring.

Section (b)(10) of 10 CFR 50.47 requires that the licensee's emergency plans shall include a range of protective actions, consistent with Federal Guidance, for the plume exposure pathway EPZ for emergency workers and the public.

The Federal guidance on protective actions to be recommended to offsite officials for general emergencies is addressed in Appendix 1 of NUREG-0654/FEMA-REP-1, Rev. 1, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." This guidance is clarified by IE Information Notice No. 83-28: "Criteria for Protective Action Recommendations for General Emergencies".

Contrary to the above, in the case where prompt protective action recommendations are warranted by plant conditions and small doses are projected for the site boundary due to present small releases, no protective actions are addressed by the implementing procedures.

This is a Severity Level IV violation (Supplement I) and applicable to all units.

2. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the planning standards of 50.47(b). 10 CFR 50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training.

Sections 5.2.1 and 5.2.3 of the Turkey Point Emergency Plan states, in part, that recommendations for protective actions will be made by the Emergency Coordinator. Section 2.2.2.1 states in part that after declaring an emergency the Nuclear Plant Supervisor becomes the Emergency Coordinator.

8405300245 840509
PDR ADOCK 05000250
G PDR

Section 7.2.2.1 of the Turkey Point Emergency Plan states that Emergency Coordinators will be trained in dose assessments. Section 5.2 of EPIP 20126 states that the Emergency Coordinator may call a Chemistry Department representative to perform dose assessments.

Contrary to the above, Nuclear Plant Supervisors interviewed during the inspection were not adequately trained in that they were unfamiliar with the Emergency Plan Implementing Procedures to the extent that incorrect protective action recommendation decisions were made for a range of situations and corresponding action levels. Additionally, the Nuclear Plant Supervisors, initially the Emergency Coordinators, are not trained to perform dose calculations and were generally unfamiliar with the procedure. Also, individuals selected by the Nuclear Plant Supervisor, on other than the day shift, to perform the dose calculations (one HP and one Chemistry Department staff) were unfamiliar with the procedures and unable to perform the required calculations.

This is a Severity Level IV violation (Supplement I) and applicable to all units.

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

FEB 29 1984

Date: _____