



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

FEB 29 1984

Report Nos. 50-250/84-01 and 50-251/84-01

Licensee: Florida Power and Light Company
 P. O. Box 14000
 Juno Beach, FL 33408

Facility Name: Turkey Point

Docket Nos. 50-250 and 50-251

License Nos. DPR-31 and DPR-41

Inspection at Turkey Point site near Homestead, Florida

Inspector: T. R. Decker
 T. R. Decker

2/27/84
 Date Signed

Approved by: G. R. Jenkins
 G. R. Jenkins, Chief, Emergency Preparedness
 Section, Emergency Preparedness and Material
 Safety Branch, Division of Emergency
 Preparedness and Materials Safety Programs

2/27/84
 Date Signed

SUMMARY

Inspection on January 16-18, 1984

Areas Inspected

This special unannounced inspection involved 18 inspector-hours on site in the area of emergency preparedness.

Results

Of the areas inspected, two violations were identified in two areas (inadequate procedures for protective action decisionmaking, failure to properly train emergency personnel in protective action recommendation requirements and in emergency dose calculations). These are discussed in paragraphs 5, 5, and 6, respectively.

8405300249 840509
 PDR ADOCK 05000250
 Q PDR

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *C. Baker, Plant Manager - Nuclear
- *R. Mende, Reactor Engineering
- *T. Finn, Nuclear Operations
- *D. Haase, OPS Superintendent
- *J. Sullivan, QC Department
- G. Jones, Plant Supervisor - Nuclear
- C. Coker, Plant Supervisor - Nuclear
- K. Metzger, Plant Supervisor - Nuclear
- G. Jennings, HP Supervisor

Other licensee employees contacted included technicians, operators, and office personnel.

NRC Resident Inspector

- *W. Ruland

- *Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on January 18, 1984, with those persons indicated in paragraph 1 above. The inspector discussed apparent violations of NRC requirements with those present. Licensee management acknowledged the inspector's findings. A schedule for completing corrective actions was provided during a telephone conversation on January 27, 1984 between H. Johnson, Corporate Emergency Planning Coordinator and G. Jenkins, Chief, Emergency Preparedness Section. The content of the communication is further discussed in paragraph 7 of this report. The licensee committed to having completed all of the items in paragraph 7 by May 17, 1984 during a telephone conversation between the above on February 24, 1984.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Protective Action Decisionmaking

The licensee's Emergency Plan and Implementing Procedures were reviewed to verify that staff and responsibility are assigned by the licensee to assess accidents and to make protective action recommendations as required by 10 CFR 50.47(b)(9) and (b)(10); by 10 CFR 50, Appendix E, Part IV.B.

The review indicated that responsibility has been assigned for making protective action recommendations.

The inspector interviewed each of the duty Nuclear Plant Supervisors on each of the three operating shifts with respect to their knowledge of their responsibility and authority as well as their ability to make protective action recommendations. The interview primarily consisted of the inspector presenting hypothetical accident situations followed by a request that the Plant Supervisor classify or determine a protective action recommendation for the emergency situation.

The Nuclear Plant Supervisors were generally unfamiliar with the procedures to the extent that incorrect protective action recommendation decisions were made for the majority of accident scenarios presented. The interviewee's appeared to be dissatisfied with their training and uncomfortable with the procedures. During annual requalification training, approximately two hours are devoted to the Emergency Plan and Implementing Procedures. The procedures are awkward and cumbersome. Based on this, the licensee was advised that they had failed to maintain a training program sufficient to ensure that licensee employees are familiar with their specific response duties. This finding was identified as a violation of 10 CFR 50.54(q) which requires the licensees to 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) (50-250, 251/84-01-01).

A review of the Emergency Plan Implementing Procedures indicated that guidelines for the choice of protective actions during an emergency were not consistent with Federal guidance as set forth in NUREG-0654 and as discussed in OIE Information Notice 83-28. Figure A-1 of Emergency Procedure 20101, "Duties of Emergency Coordinator", indicates that the flowchart for determining protective action recommendations based on plant conditions is only to be used when off-site dose projections are not available. In procedure 20101, item 3 of the "Protective Action Recommendations Checklist" states that if an emergency has been classified and off-site dose information is available (from any credible source), dose information is to be used to select the appropriate table. Either Figure A-2 (Protective Actions with off-site dose estimates for greater than or equal to 2 hour duration) or Figure A-3 (Protective Action with off-site dose estimates for less than 2 hours duration) are to be used in that case. If these procedures are followed as written, in that 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 precautionary protective actions would be recommended. Failure of the licensee to incorporate procedures for generating protective action recommendations consistent with

Federal guidance is a Violation of 10 CFR 50.47(b)(10) (50-250, 251/84-01-02).

6. Dose Calculation and Assessment

The inspector reviewed the Implementing Procedures and interviewed licensee personnel to determine if adequate dose calculation procedures and training had been provided. The procedure reviewed appeared to be consistent with standard practice. Plant Supervisors and Chemistry Department representatives are designated in the Emergency Plan and Implementing Procedures as being responsible for dose calculations. Of those interviewed, none were able to use the manual Off-Site Dose Calculation procedure, (Emergency Plan Implementing Procedure 20126), with facility and several stated that they had not seen the procedure before. The inability of designated emergency personnel to perform off-site dose calculations given in the procedure is indicative of a lack of or improper training. Failure to provide proper training is a Violation of 10 CFR 50.47b(15) (50-250, 251/84-01-03).

7. Corrective Action

During the January 27, 1984, telephone conversation between H. Johnson, FPL Emergency Preparedness Coordinator and G. Jenkins, Chief, Emergency Preparedness Section, the following information was provided: By February 3, 1984, chemistry technicians will have been trained in Emergency Plan Implementing Procedure (EPIP) 20126, "Offsite Dose Calculation"; all Nuclear Plant Supervisors and Watch Engineers will have received further training in EPIP 20101 and 20103, "Duties of Emergency Coordinator" and "Classification of Emergencies," respectively; and, EPIP 20101 will have been revised to incorporate protective action recommendations based on core conditions. The licensee has further committed to revise the procedures used by Chemistry Department staff for off-site dose calculations. Further, the licensee has agreed to review and revise, as necessary, EPIP's 20101 and 20103 in order to provide more easily used procedures.