

**Florida
Power**
CORPORATION

February 26, 1985
3F0285-11

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Interpretation of 10 CFR 20.203(f)

Dear Sir:

As stated in 10 CFR 20.203(f), containers of licensed material are required to bear a label identifying the contents with sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures. Florida Power Corporation (FPC) currently complies with this requirement by requiring that a RADIOACTIVE MATERIAL tag be placed on all containers of radioactive materials (e.g., drums, bags). Information on the tag includes dose rates, activity, and date. Even very low level containers are tagged with this information.

Due to the large amount of Radioactive Material generated at a commercial nuclear facility, the practice of labeling each container of Radioactive Material is time consuming, counterproductive, and at times difficult to maintain. During certain periods (e.g., the conclusion of an outage), a large amount of manpower is necessary to survey and tag the large quantity of materials being removed from the Reactor Building. This is an inefficient use of highly trained and specialized personnel. A reduction in the time necessary to tag Radioactive Materials can free personnel for more vital duties elsewhere. Additionally, the practice of labeling all containers of Radioactive Materials does not add a significant amount of protection beyond the level of protection maintained through other exposure controls.

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The labeling requirements referenced above are not necessary if the containers "are attended by an individual who takes precautions necessary to prevent the exposure of any individual to radiation or Radioactive Materials in excess of the limits established by the regulations of this part" (10 CFR 20.203.f.3.IV.). Florida Power Corporation plans to utilize this alternative for Radioactive Material within the "Radiation Controlled Area" (RCA). Specifically, Radioactive Material in an RCA does not need to be labeled because the area is only accessible to individuals qualified to handle or work in the vicinity of Radioactive Materials and because RCA's are attended.

Controls established to prevent exceeding the exposure limits from containers of Radioactive Material includes:

Inside an RCA:

- o Training
All employees allowed to enter an RCA are trained on the appropriate radiological procedures and precautions to follow in the RCA. Only employees with radiological training are allowed unescorted access to the RCA's.
- o Identification
All containers of Radioactive Materials are identified by the use of conventional radiation caution colors (yellow and magenta).
- o Posting
Areas are posted (RADIATION AREA, etc.) as required by 10 CFR 20.203.
- o Attendance
Health Physics technicians are on site continuously to monitor and control activities inside the RCA's.
- o Opening Containers
Individuals are required to notify Health Physics personnel and obtain appropriate approvals (i.e., Radiation Work Permit) prior to breaching container integrity.
- o Radiation Work Permits
A Radiation Work Permit is required for any task inside an RCA, including specifically breaching of systems, containers and/or containment integrity.

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Outside an RCA:

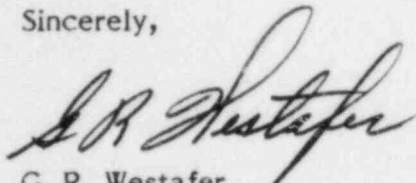
- o Containers of Radioactive Materials are labeled in accordance with 20.203(f)(1) and (2) or placed in another RCA and escorted during transit.

This interpretation of 10 CFR 20.203(f) is being provided for your concurrence.

This program would be beneficial for the upcoming outage, thus, we request feedback be provided by March 8, 1985 and that formal concurrence be provided thereafter. If further clarification is needed, please contact Mrs. Patti Haines of my staff at (904) 795-3802, who will coordinate such request with our Chemistry and Radiation Protection and/or Radiological Support Services Staffs.

Your attention to this matter will be appreciated.

Sincerely,



G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

PGH/feb

cc: Dr. J. Nelson Grace
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