

# UNITED STATES NUCLEAR REGULATORY COMMISSION

#### REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30303

OCT 0 5 1984

Report Nos.: 50-250/84-31 and 50-251/84-32

Licensee: Florida Power and Light Company

9250 West Flagler Street

Miami, FL 33101

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: September 10 - 13, 1984

Inspector: N. R. Marston

R Marston

Approved by: M.C. Cline

W. Cline, Section Chief

Division of Radiation Safety and Safeguards

10/3/84

Date Signed

10/9/84

Date Signed

#### SUMMARY

Scope: This routine, unannounced inspection entailed 29 inspector-hours on site in the areas of emergency preparedness.

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

#### REPORT DETAILS

#### Licensee Employees Contacted 1.

\*K. N. Harris, FP&L Vice President, Turkey Point

\*J. A. Labarraque, Acting Plant Manager \*D. Grandage, Operations Superintendent

\*K. L. Jones, QA Superintendent

H. D. Johnson, FP&L Supervisor, Emergency Planning R. A. Meck, FP&L Acting Supervisor Emergency Planning

M. H. Johnson, FP&L Supervisor, Emergency Management Systems \*J. Ariss, Jr., Regulatory and Compliance Supervisor

\*W. C. Miller, Training Supervisor

\*E. A. Suarez, Technical Department Supervisor M. A. Jiminez, FP&L Nuclear Energy Specialist

R. D. Mothena, FP&L Coordinator, Radiological Emergency Planning

J. O. Woolverton, FP&L Communications Coordinator

R. J. Spooner, FP&L QA Evaluator

\*J. D. Ferrare, QA Engineer \*F. Houtz, QC CASR Coordinator

\*G. A. Casto, Emergency Planning Coordinator

NRC Resident Inspectors

T. Peebles

\*Attended exit interview

#### Exit Interview 2.

The inspection scope and findings were summarized on September 13, 1984. with those persons indicated in paragraph 1 above.

Licensee Action on Previous Enforcement Matters 3.

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Notification and Communications (82203)

> This area was inspected pursuant to the requirements of 10 CFR 50.47(b)(5) and (6) and 10 CFR 50, Appendix E, paragraphs IV.D and E, to determine whether the licensee was maintaining a capability for notifying and communicating among licensee personnel, offsite supporting agencies and authorities, and the population within the EPZ in the event of an emergency.

The licensee management control program for the prompt notification system was reviewed. According to licensee documentation and discussions with licensee representatives the system consists of 35 fixed sirens.

Licensee records showed that the system as currently installed was consistent with the description contained in the emergency plan. Maintenance of the system has been provided for by the licensee. The inspector reviewed seven test records for 1984. The test records showed that tone and position tests were conducted every two weeks, quarterly maintenance growl tests were conducted quarterly, and complete cycle tests were done annually as specified in NUREG 0654, Appendix 3. No offsite agency problems relating to the prompt notification system were brought to the attention of the inspector during these discussions.

Communications equipment in the EOF was inspected. Provisions exist for prompt communication among emergency response organizations, to emergency response personnel, and to the public. The installed communications systems at the EOF are consistent with system descriptions in the licensee emergency plan and emergency procedures.

No violations or deviations were identified in this program area.

6. Changes To The Emergency Preparedness Program (82204)

This area was inspected pursuant to the requirements of 10 CFR 50.47(b)(16), 10 CFR 50.54(q) and 10 CFR 50, Appendix E, paragraphs IV.G, and V to determine whether the licensee has made changes to the program since the last inspection and to note how these changes affect the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector verified that changes to the emergency plan and emergency procedures were reviewed and approved by management. It was noted that all changes to the emergency plan and implementing procedures were submitted to NRC within 30 days of such changes. Based on a review of selected changes to the licensee's emergency plan and emergency procedures, the inspector determined that the changes did not decrease the level of emergency preparedness.

Discussions were held with licensee representatives concerning modifications to facilities, equipment, and instrumentation. By review of selected procedures the inspector verified that procedure and plan changes had been made to reflect the modifications to emergency response facilities.

The organization and management of the emergency preparedness program was reviewed. The inspector verified that there had been changes in the organization or assignment of responsibility for the plant and corporate emergency response staffs since the last inspection. These changes were reflected in the emergency plan. By discussion with licensee representatives the inspector determined that there had been no significant changes in the organization and staffing of the offsite support agencies since the last inspection.

A review was conducted of the licensee's program for distribution of changes to the emergency plan and procedures. Licensee document control records for 1984 showed that appropriate personnel and organizations were sent copies of plan and procedural changes as required.

No violations or deviations were identified in this program area.

#### 7. Shift Staffing and Augmentation (82205)

This area was inspected pursuant to the requirements of 10 CFR 50.47(b)(2) and 10 CFR 50, Appendix E, paragraph IV.A to determine whether shift staffing for emergencies was adequate in number and in functional capability and that administrative and physical means were available and maintained to augment the emergency organization in a timely manner.

Shift staffing levels and functional capabilities of all shifts were reviewed and compared against the guidance of Table B-1 of NUREG 0654. The licensee level of staffing and capabilities were consistent with the guidance in table B-1, NUREG 0654.

The licensee has established a Duty Call Supervisor System so that essential offshift personnel are available if needed. A review of the licensee's offshift call-in procedure appears to be effective in meeting table B-1 goals.

The inspector discussed staff augmentation times with licensee representatives. Licensee representatives indicated that call out drills and response time estimates revealed that the Table B-1 augmentation times could be met.

No violations or deviations were identified in this program area.

### 8. Training (82206)

This area was inspected pursuant to the requirements of 10 CFR 50.47(b)(14) and (15), and 10 CFR 50, Appendix E, paragraph IV.F. to determine that emergency response personnel understood their emergency response roles and were able to perform their assigned functions.

The inspector reviewed licensee training program descriptions in the evergency plan, reviewed training procedures, reviewed selected lesson plans and interviewed members of the training program staff. Based on this review and interviews, the inspector determined that the licensee has established a formal emergency training program.

Records of training for key members of the emergency organization for the period 1983 and 1984 to the present were reviewed. The training records revealed that personnel designated as alternates or given interim responsibilities in the emergency organization had been provided with appropriate training. According to the training records the type, amount, and frequency of training was consistent with approved procedures.

No violations or deviations were identified in this program area.

### 9. Dose Calculation and Assessment (82207)

This area was inspected pursuant to the requirements of 10 CFR 50.47(b)(9), and 10 CFR 50, Appendix E, paragraphs IV.B and IV.E.2, to determine that there were adequate methods and equipment for assessing consequences caused by a radiological release.

Dose assessment equipment and procedures at the EOF were reviewed and discussed with licensee representatives. The new dose assessment computer and program was evaluated by the staff and expected to be used for the annual exercise.

No violations or deviations were identified in this program area.

#### 10. Public Information Program (82209)

This area was inspected pursuant to the requirements of 10 CFR 50.47(b)(7) and 10 CFR 50, Appendix E, paragraph IV.D.2 to verify that basic emergency planning information was disseminated to the public in the plume exposure pathway emergency planning zone (EPZ) on an annual basis.

The licensee has developed an emergency response information brochure for use by the public residing in or frequenting the 10 mile EPZ. Licensee representatives stated that the brochure is updated annually as a joint effort of FP&L, the State and the local agencies. The inspector reviewed the current brochure and verified that it included the information specified by NUREG 0654, Section II.G.

Means for disseminating information to the transient population was discussed with licensee representatives. The means used by the licensee to keep the transient population aware of appropriate emergency response includes metal signs on beaches and in parks throughout the EPZ. Licensee representatives stated that the State distributes the brochure through the EPZ once per year. They also stated that FP&L and the other power company serving the area were starting a supplemental distribution program based on requests for new electrical service.

The public information brochure provided several points of contact where additional information could be obtained. Licensee representatives stated that FP&L has several telephone numbers listed so individuals can call for information. In addition, the licensee representatives stated that FP&L and the State plan to make the next brochure, to be published in December 1984, available in both English and Spanish versions.

No violations or deviations were identified in this program area.

# 11. Licensee Audits (82210)

This area was inspected pursuant to the requirements of 10 CFR 50.54(t) to determine that annual independent reviews or audits of the emergency preparedness program were prepared.

The licensee's program for followup action on audits, drills, and exercise findings were reviewed. Licensee procedures required followup on deficient areas identified during audits, drills, and exercises. The inspector reviewed licensee records which indicated that corrective action was taken on problems identified as appropriate. The licensee has established a tracking system as a management tool in following-up on actions taken on deficient areas.

Licensee emergency plans and procedures required critiques following exercises and drills. Licensee documentation showed that critiques were held following the annual exercise and following drills. The records showed that deficiencies were discussed in the critiques and recommendations for corrective actions were made.

Records of audits of the licensee emergency preparedness program were reviewed. The records showed that independent audits of the program were conducted by the corporate QA staff at corporate and at the plant. These audits meet the 12 month frequency requirements for such audits as specified in 10 CFR 50.54(t) and in licensee procedures. The audit records showed that the state and local government interface was evaluated, and that findings concerning the interface were made available to state and local government authorities. Audit report findings and recommendations were presented to plant and corporate management. A review of past audit reports indicated the licensee complied with the five year retention requirement for such audit reports.

No violations or deviations were identified in this program area.

# 12. Inspector Followup (92701)

(Closed) Inspector Followup Item (IFI) 81-24-72: Followup and closeout eight items from corporate audit report QAO-PTP-81-08-36. The inspector reviewed the items and verified that corrective action was complete.

(Closed) IFI 84-19-01: Develop a formal tracking system for emergency response training. The inspector reviewed Emergency Procedure 20201, REP Training, and verified that it included a tracking program for the training.

(Closed) IFI 84-19-02: Make provision for consideration for field measurements in dose assessment. The inspector reviewed Emergency Procedures 20101, Duties of Emergency Coordinator, and 20126, Offsite Dose Calculation, and verified that both required consideration of field monitoring results.