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**Florida  
Power**  
CORPORATION

April 4, 1985  
3F0485-04

Dr. J. Nelson Grace  
Regional Administrator, Region II  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 2900  
Atlanta, GA 30323

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
IE Inspection Report No. 85-05

Dear Sir:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

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

AEF/feb

Attachment

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**FLORIDA POWER CORPORATION  
RESPONSE**

**INSPECTION REPORT 85-05**

**VIOLATION 85-05-01**

10 CFR 20.103(a)(3) states in part that the licensee shall use measurements of radioactivity in the body, measurements of radioactivity excreted from the body, or any combination of such measurements as may be necessary for timely detection and assessment of individual intakes of radioactivity by exposed individuals.

10 CFR 20.103(c)(2) requires the licensee to maintain and implement a respiratory protection program that includes surveys and bioassays as appropriate to evaluate actual exposures.

Technical Specification 6.8.1 requires the station to establish, implement, and maintain approved written procedures covering various activities recommended in Appendix A of Regulatory Guide 1.33, November 1972, including the bioassay program.

Contrary to the above, the licensee did not have approved written radiation protection procedures for the calibration of the whole-body counting system presently in use. The current approved calibration procedure for the whole-body counting system (RP-214, Rev. 2, 11/28/81) referred to a measurement system no longer in use.

This is a Severity Level V violation (Supplement IV).

**RESPONSE**

**Florida Power Corporation's Position:**

Florida Power Corporation disagrees with the stated violation.

The bioassay program is not included in Appendix A of Regulatory Guide 1.33, November 1972. Therefore, Florida Power Corporation was not in violation of Technical Specification 6.8.1. However, Florida Power Corporation does have a program to implement the referenced sections of 10 CFR 20 and has revised the procedure for calibrating the whole-body counting system presently in use.