

From: James L. Kreh (JLK1) NRC 22
To: KPB (K. Barr, NRC, 22
Date: Monday, July 18, 1994 11:38 am
Subject: FP&L GENERIC EP ISSUES

In a telephonic discussion this morning with Don Mothena, FP&L Corporate EP Manager, the following generic issues arising from E-Plan changes for Turkey Point and St. Lucie were discussed:

(1) The licensee thought they were "doing the right thing" and being conservative by subtracting an individual's current annual occupational exposure from the 5-rem limit to determine the allowable dose for nonmitigating actions by emergency workers. I had made reference last week during my discussion with Mothena to the 8th set of Q&A on the revised Part 20, but he said FP&L has not yet received that document. I faxed him the pages which included Questions 472 and 474, which are particularly applicable to the issue under discussion. He said they will "likely" be willing to make the appropriate change in the next revision of the respective Plans, but wasn't prepared just yet to make a firm commitment in that regard.

(2) With respect to the matter of using "total whole body dose" to mean the same as TEDE and "total thyroid dose" to mean the same as thyroid CDE, the licensee has much less control. This approach was decided in meetings involving FP&L, FPC, the State of Florida, and cognizant local officials (too bad the licensees didn't run this past us prior to implementation). Mothena would say only that he and John Stephenson would be raising this issue in scheduled meetings this fall with State and local officials. I pointed out to him that this usage was not in conformance with 10 CFR 20.1003 (Definitions), but this is admittedly nitpicking as opposed to a matter of substantive nonconformance with the regulations.

I am ready to discuss this matter further with you at your convenience.

CC: WEC1