



Radiological Environmental Monitoring Program  
and Site Non-Radiological Environmental Protection Plans  
Functional Area Audit

QAS-ENV-95-1

May 25, 1995 - July 14, 1995

Audit Team:

Douglas B. Huey  
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22/1



## QUALITY ASSURANCE AUDIT REPORT QAS-ENV-95-1

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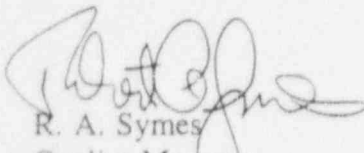
To: J. L. Danek, K. Heffelfinger, J. Kirkpatrick      Date: JQA-95-038  
July 25, 1995

From: R. A. Symes      Department: JNA/JB

Subject: **Functional Area Audit of Radiological Environmental Monitoring Program  
and the Site Non-Radiological Environmental Protection Plans**

Enclosed is the Functional Area Audit report for your information. There were no findings identified during the audit, therefore, no direct response to Quality Assurance is required. Juno Beach Condition Report (95-023) was generated to address procedure deficiencies and will require corrective action in accordance with IP 803.

We appreciate the cooperation we received from your staff during the course of the audit. Please contact me at 694-4287 if you have any questions.

  
R. A. Symes  
Quality Manager  
Juno Beach

RAS/dbh



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## Executive Summary

Quality Assurance verified the program adequacy and assessed the implementation of the activities associated with FPL Radiological Environmental Monitoring Program (REMP), and Turkey Point and St. Lucie Non-Radiological Environmental Protection Plans. The audit included:

### Radiological:

- Observation of environmental sample collection procedures;
- Observation of the Turkey Point land use census;
- Review of Department of Health & Rehabilitative Services (DHRS) laboratory procedures for sample collection and analysis;
- Review of the Interlaboratory Comparison Program results;
- Review of the Turkey Point & St. Lucie Annual Radiological Environmental Operating Reports;

### Non-Radiological:

- Site construction and operational activity environmental effects;
- Site reporting responsibilities;
- National Pollution Discharge Elimination System (NPDES) permit modifications and renewals;
- Environmental record maintenance and storage;
- St. Lucie Sea Turtle Monitoring Program.

DHRS environmental procedures in place to meet FPL REMP requirements require revision to be consistent with current practices. Juno Beach Condition Report (JBCR) 95-023 was initiated to ensure corrective action is implemented. See page 4 for additional details. No adverse impact on the Radiological Environmental Monitoring Program sampling or analysis was identified resulting from the procedural deficiencies.

Based on the activities and objective evidence audited, it was determined that the requirements of the QA Program, FPL Radiological Environmental Monitoring Program, Turkey Point Non-Radiological Environmental Protection Plan, and the St. Lucie Non-Radiological Environmental Protection Plan, are adequately addressed by procedures and the implementation of those procedures was effective.



## Summary of Audit Results

This functional area audit was conducted to verify program adequacy and assess the implementation of the FPL Radiological Environmental Monitoring Program, Turkey Point and St. Lucie Non-Radiological Environmental Protection Plans, and the applicable QA Program requirements. The audit satisfies the requirements of the PSL Unit Nos. 1 & 2 Technical Specification 6.5.2.8.h and PTN Technical Specification 6.5.2.8.g, for the Radiological Environmental Monitoring Program; and the PSL and PTN Technical Specification 6.5.2.8.a for the Non-Radiological Environmental Protection Plan, Appendix B. Additionally, the areas of self-assessment, NRC inspection reports, Operating Experience Feedback System, and corrective action were examined.

### Turkey Point and St. Lucie Radiological Environmental Monitoring Program

The REMP for Turkey Point and St. Lucie is implemented by the Corporate Staff Health Physics & Chemistry groups. The State of Florida Department of Health and Rehabilitative Services Office of Radiation Control performs environmental sampling and analysis in accordance with site Technical Specifications for Florida Power & Light. The sampling results are provided to FPL in quarterly reports for each nuclear site. This information is assembled into the annual Radiological Environmental Reports.

The 1994 Annual Radiological Environmental Operating Reports for both Turkey Point and St. Lucie plants were verified by Quality Assurance to contain the required information. Sample analysis results, and comparisons of results with previous environmental surveillance reports; annual land use census information; notes and explanations for missing results; detailed maps of sampling locations; results of the Interlaboratory Comparison Program; discussions of sampling deviations as appropriate; and discussion of analysis for which the lower limits of detection (LLD) were not achievable; were discussed as required in the reports. The reports met all site Technical Specification requirements and were transmitted to the NRC within the required time limits.

Environmental sample collection procedures were observed at both Turkey Point and St. Lucie collection sites. Air and water sample collection in accordance with DHRS procedures was monitored. Samples were obtained from the pre-determined locations specified by Technical Specification requirements. All sample collections observed were properly identified with the required information. Sampling frequencies were in accordance with the requirements. Air sampling equipment was observed to be maintained in good physical condition and calibrated within the required frequency.

Turkey Point and St. Lucie Technical Specifications require a land use census be conducted annually within a distance of five miles in each of the meteorological sectors around the plants. The purpose is to identify the nearest milk producing animal, residence, and garden producing broad leaf vegetation for human consumption. The audit team observed only the Turkey Point



land use census conducted June 20, 1995, in accordance with DHRS procedure SP-12, Rev. 1. The land use census involved aerial surveillance followed up on the ground by a state environmental inspector. A watercress farm, High Hope Nursery, and Hell Bent Tree Farms, all in the NNW sector; a construction salvage operation and a farmhouse in the NW sector; and Homestead Bayfront Park and Biscayne National Park in the North Sector were all investigated during the land use census. Persons at each location were interviewed by the state inspector to determine the frequency of occupancy and the specific uses of the property as they pertain to the Turkey Point REMP. DHRS personnel were very thorough in investigating and assessing potential gardens and milk producing animals. The census was performed in a methodical manner. Turkey Point and St. Lucie 1994 land use census reports were reviewed and identified to contain all Technical Specification required information.

During the 1994 Quality Assurance audit, the technical specialist provided recommendations to DHRS for procedural improvements necessary as a result of the transition to a new TLD system. This new TLD system is for PSL and PTN environmental monitoring. Additionally, documented annual internal reviews, by DHRS, of the DHRS procedures manual have identified needed revisions during the 1992, 1993, and 1994 reviews. The TLD Calibration procedure CP-1-5, Gas Meter Calibration procedure CP-7-4, Sampling procedure SP-3-2, and Administrative procedure AP-C-7 have all been identified as requiring changes but have not been revised since the above mentioned DHRS reviews. These DHRS environmental procedures require revision to be consistent with current practices. JBCR 95-023 was initiated to ensure corrective action is implemented. JNO Health Physics will be responsible for the corrective action oversight of DHRS. No adverse impact on the Radiological Environmental Monitoring Program sampling or analysis was identified from the procedural deficiencies.

In investigating this deficiency it was identified that FPL requirements and expectations imposed on DHRS are communicated in a verbal manner. A formal documented agreement for the implementation of the REMP program does not exist between FPL and DHRS. A documented agreement could serve to better define requirements and expectations for the implementation of the Radiological Environmental Monitoring Program. Quality Assurance recommended a formal agreement be pursued.

#### **Turkey Point Non-Radiological Environmental Protection Plan**

Quality Assurance reviewed Turkey Point environmental activities to verify compliance with the Technical Specification Environmental Protection Plan (EPP). PTN Environmental Protection administrative procedures, federal and state environmental permits, and plant change/modification package (PCM) environmental screening records were examined during the audit.

Reports and notifications are required to be made to regulating agencies for permit renewals, violations, and the occurrence of unusual events. No permit violations or unusual events were identified since the last audit. The current site National Pollution Discharge Elimination System (NPDES) permit was approved on September 12, 1994. The site failed to make the required





NRC notification within 30 days. As a result PTN Condition Report 95-344 was generated and corrective actions were implemented. Environmental permit critical dates were added to the CTRAC system to ensure required notifications are made in the future. These actions will continue to be assessed in future Quality Assurance audits. Additionally, the State of Florida has assumed the responsibility for the administration of the NPDES permitting process and eliminated the State 401 certification requirements. As a result, EPP Technical Specification changes will be necessary to reflect the current permitting requirements. The site Environmental and Licensing Groups will be responsible for these changes.

Fossil and Land Utilization groups are also responsible for compliance with the NPDES permit requirements. Only one NPDES permit is issued for the Turkey Point site. In the event that a permit violation occurs as a result of Fossil or Land Utilization operations, NRC notification is required. Currently no mechanism exists to provide notification to the Nuclear side of the facility. As a result of the audit, a Plant Manager's Action Item (PMAI), 95-06-140, was generated to establish a communications mechanism between Fossil, Land Utilization, and the Nuclear Environmental Group. This action is due for completion August 31, 1995. Additionally, a review of Fossil and Land Utilization environmental compliance of the last twelve months will be completed by the PTN Nuclear Environmental Group under PMAI 95-06-141.

Construction or operational activities that may affect the environment are required to be evaluated to determine if an unreviewed environmental question exists. Activities are excluded from this requirement if all measurable non-radiological effects are confined to the on-site areas previously disturbed during site preparation, plant construction, and previous plant operation. PCMs are reviewed for environmental impact in accordance with the criteria contained in the Turkey Point Environmental Department Administrative Directive Manual. This review is performed prior to the approval of the PCM. The 1994 log of PCM environmental reviews indicated there has not been any design change or operational activities resulting in unreviewed environmental questions. Additionally, Engineering is responsible for an environmental impact review during the design process.

Environmental record maintenance and storage was examined during the audit. Required records are being maintained. PCM records are maintained in the plant document control center and are retrievable. Other records such as permits, logs, reports, etc. are maintained by the PTN Environmental Department and Corporate Environmental Group. All records examined were found to meet storage requirements.

#### **St. Lucie Non-Radiological Environmental Protection Plan**

Quality Assurance reviewed St. Lucie environmental activities to verify compliance with the Technical Specification Environmental Protection Plan (EPP) and Florida Department of Environmental Protection (FDEP) permit TP#099. PSL Environmental Protection administrative procedures, federal and state environmental permits, handling of sea turtles, and PCM environmental screening records were examined during the audit.



Reports and notifications are required to be made to regulating agencies for permit renewals, violations, and the occurrence of unusual events. Two unusual environmental events occurred during the current audit period. On both occasions storm water from the east parking lot washed out a mangrove impoundment wall. Corrective actions were completed within approximately two months of the first washout incident. To date, impoundment wall modifications have been successful in preventing washout conditions. NRC notification was made within the 30 day time requirements for both environmental events.

The current site National Pollution Discharge Elimination System (NPDES) permit was modified effective November 1, 1994. The modification eliminated two outfalls to surface water. Additionally, the mangrove impoundment construction project and modifications were added to the permit. An error was identified in the permit upon receipt by PSL. While pursuing the error correction, the 30 day notification requirement was exceeded. NRC notification was made on May 16, 1995. After discussion between the lead auditor and the PSL Protection Services Supervisor, it was agreed that NRC notification should have been made upon permit receipt and again when the error was corrected. PSL procedures address the reporting requirements and direct the notification be made within 30 days. Additionally, the State of Florida has assumed the responsibility for the administration of the NPDES permitting process and eliminated the State 401 certification requirements. As a result, EPP Technical Specification changes will be necessary to reflect the current permitting requirements. The site Environmental and Licensing Groups will be responsible for these changes.

Construction or operational activities that may affect the environment are required to be evaluated to determine if an unreviewed environmental question exist. Activities are excluded from this requirement if all measurable non-radiological effects are confined to the on-site areas previously disturbed during site preparation, plant construction, and previous plant operation. This review is performed by the St. Lucie Technical Department. Additionally, Engineering is responsible for an environmental impact review during the design process. No evaluations were required during the current audit period.

Environmental record maintenance and storage was examined during the audit. Required records are being maintained. Records of modifications to plant structures, systems, and components determined to potentially affect the environment are contained in the PCM document packages. These records are maintained in the plant document control center and are retrievable. The NPDES permit is maintained by the Corporate Environmental Group. All records examined were found to meet storage requirements.

### **Sea Turtle Monitoring Program**

Florida Power & Light has obtained the necessary permit, FDEP permit TP#099, for handling of sea turtles as required by Technical Specifications. The permit was issued to Dr. Johnathan C. Gorham, Quantum Resources/Florida Power & Light. The permit authorizes nesting surveys, turtle capture by net and hand, turtle tagging, nest relocation, hatchling rescue and release, and





stranding/salvage operations. Additionally, only personnel listed on the permit are authorized to perform these activities. All activities observed by the audit team were in accordance with the requirements of FDEP permit TP#099.

Two nets deployed in the intake canal were observed during the audit. During the audit, netting operations were being conducted seven days a week, twelve hours a day, due to the nesting season. The nets are continuously monitored from the shoreline or intake structure. Once per hour the nets are inspected via boat to verify no turtle is caught in the net and the nets are not tangled. This netting operation was performed in accordance with St. Lucie Technical Specifications and FDEP permit TP#099. Three Green turtle captures were observed during the audit. The turtles were tagged for identification purposes. The records generated when determining the turtle weight, species, measurements, wounds, barnacle coverage, and other appropriate information were identified with the tag numbers. Following collection of the required information and examination of the turtles, the turtles were photographed, returned to the shoreline, and released into the Atlantic Ocean. All permit requirements were met.

The nesting survey conducted June 14, 1995 was observed during the audit. The nesting survey is conducted on Hutchison Island in survey zones A - S. Sea turtle nests are identified during the survey and records maintained accordingly. Sea Turtle Monitoring Procedures require the nesting survey be conducted seven days a week from April 15th to approximately September 15th.

A light screen is required to be maintained along the beach dune bordering the plant property to minimize turtle disorientation. The light screen was observed during the audit. Australian pine, sea oats, and other vegetation make up the light screen. The discharge structure area vegetation level does not provide a sufficient light screen so additional measures are implemented. Black mesh cloth has been erected on the fencing to minimize the light in this area. A large number of Sea Grapes have been planted in the discharge area to increase the light shield effectiveness and eventually permit the removal of the shade cloth. The vegetation and the cloth are maintained by PSL Land Management under the direction of the Senior Environmental Specialist.

Records of turtle strandings (dead turtles) were reviewed. To date in 1995, 13 dead turtles have been recovered. A number of the strandings were recovered in the intake wells. This number is unusually high and has resulted in discussions with the NRC, FDEP, Natural Marine Fisheries, and the Sea Turtle Monitoring Program staff. FPL is in the design and planning stages for the installation of a new barrier net system to replace the existing barrier net currently in place east of the A1A bridge. The new net is designed to have a 4 inch mesh size that will prohibit turtles from passing. This should minimize future turtle strandings in the canal system. This effort will be evaluated in future audits.

Sea Turtle Monitoring Program records were examined and found to be complete and organized. Worksheets are utilized for recording information on specific turtles. The information is then entered in to a database maintained by Sea Turtle Monitoring personnel. The database is used



as an information storage location. Hard copy reports are assembled on a monthly basis, distributed, and stored as a QA record. These reports serve to meet the records requirements.

Personnel working within the Sea Turtle Monitoring Program were observed to be knowledgeable and very professional in the performance of their duties. Great care and consideration were demonstrated when handling sea turtles.

### **Self-assessment**

#### **Turkey Point and St. Lucie Radiological Environmental Monitoring Program**

Some ongoing activities related to the Radiological Environmental Monitoring Program fall into the category of self-assessment. Industry publications and the Violations Alert List are reviewed periodically for applicability. A determination is made if events are applicable to the REMP and if required, actions are taken. Data associated with the REMP are periodically reviewed to determine if analysis or sample results are deviating from expectations. Data is tracked and analyzed to determine if adverse trends are developing. Self-checks, reviews, and analysis performed of the data assembled for the REMP, are in place to maintain the quality of the information and direct improvement actions if required. These efforts focus on data and analytical results. A formal mechanism for the self-assessment of DHRS program activities does not exist. A self-assessment program directed at DHRS activities may have prevented the procedural deficiencies identified on page 4.

#### **Turkey Point & St. Lucie Environmental Protection Plans**

Some ongoing activities related to the Turkey Point and St. Lucie Environmental Protection Plans also fall into the category of self-assessment. Documented bimonthly summaries of Environmental issues are published by both site Environmental Groups and distributed to appropriate management. These documents detail the respective site issues and provide site management with a status of actions associated with the issues. These reports are exchanged between site Environmental Groups. This was identified by the audit team as a good practice. Significant environmental issues requiring corrective actions are assigned and followed as Plant Manager's Action Items or Condition Reports in accordance with O-ADM-518 at Turkey Point. St. Lucie environmental issues are tracked and monitored through the use of STAR system. Both site systems provide a mechanism for undertaking corrective action.

A hazardous waste procedure for the St. Lucie site is now in place. The procedure is titled "Best Management Practices/Pollution Prevention Program." This procedure requires pollution prevention measures and a waste minimization plan. This is a new requirement of the St. Lucie NPDES permit. Effectively implemented, the result will be a continuous assessment of the chemicals and processes used in the generation of hazardous waste in an effort to minimize the adverse effects on the environment. Improved solutions to waste management issues are the goals of this program.



Turkey Point is in the process of developing a site Environmental Review Group. This group will function to address environmental issues that impact the PTN environment and operations. The effectiveness of these activities will be assessed in future audits.

Although no formal documented self-assessment program exists relating to the implementation of the Turkey Point and St. Lucie Environmental Protection Plans, environmental issues and areas needing improvement at both FPL nuclear sites are identified and corrective actions taken.

### **Analysis of NRC Inspection Reports and In House Events**

Licensee Event Reports (LERs), problem reports, in-house event reports, and NRC inspection Reports were reviewed for Radiological Environmental Monitoring Program and Technical Specification Environmental Protection Plan issues. No issues applicable to these activities during the last audit period were identified.

### **Operating Experience Feedback Program**

A review of the Operating Experience Feedback Program and Nuclear Network Significant Event Reports was performed. There have not been any items applicable to the Radiological Environmental Monitoring Program or the Technical Specification Environmental Protection Plan within the past year that required actions.

### **Corrective Action**

The previous Quality Assurance audit of the Radiological Environmental Monitoring Program and the site Technical Specification Non-Radiological Environmental Protection Plans required no corrective action. Recommendations for procedural enhancements were provided to the St. Lucie Environmental Group during the 1994 audit. Quality Assurance identified that it was unclear who was responsible for the EPP reporting function. Administrative Procedure 0005762, "Plant Guide to Reporting Environmental Non-Compliances and Significant Events," now assigns responsibility for the reporting function. Quality Assurance PMON QAS-ENV-94-1P on the Sea Turtle Monitoring Program provided records management suggestions. At the time of the PMON a records system was not in place. The records system that was developed by PSL Land Management captures the required information and is relatively simple to administer. Corrective action related to Self-assessment, analysis of NRC inspection reports and in-house events, etc. are discussed in the appropriate sections of this audit report. Additionally, corrective actions are consistently implemented in response to situations identified during daily operations, e.g., the addition of vegetation along the discharge canal dune line to supplement the light screen. Other examples are contained throughout the report.



## Satisfactory Areas

Radiological environmental sample collection and analysis  
Annual Radiological Environmental Operating Reports  
Turkey Point and St. Lucie annual land use census  
Site reviews of construction and operational activities  
Environmental records maintenance

### Pre-Audit Conference

Location: Juno Beach  
Date: May 25, 1995

### Post-Audit Conference

Location: Juno Beach  
Date: July 14, 1995

## Summary of Post-Audit Conference

The results of the audit were presented at the post audit conference. Separate post-audit teleconferences were held for the site Environmental Protection Groups. The audit team thanked the Turkey Point and St. Lucie Environmental Protection Groups; and the Nuclear Services Radiological Environmental Monitoring staff for their cooperation and assistance.



## Audit Participants

<u>Name</u>	<u>Department/Group</u>	<u>A</u>	<u>B</u>	<u>C</u>
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D. J. Canazaro	JNA		X	
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### Key:

- A - Attended Pre-Audit Conference
- B - Interviewed or Contacted During Audit
- C - Attended Post-Audit Conference

## References

1. PSL Technical Specifications, Appendix B, Environmental Protection Plan
2. PTN Technical Specifications, Appendix B, Environmental Protection Plan
3. St. Lucie Annual Environmental Operating Report, April 1994
4. St. Lucie Plant Administrative Procedure No. 0005762, "Plant Guide to Reporting Environmental Non-Compliances and Significant Events"
5. PSL Chemistry Procedure, C-200, "Off-site Dose Calculation Manual"
6. "PTN Off-site Dose Calculation Manual for Gaseous and Liquid Effluents from the Turkey Point Plant Units 3 & 4"



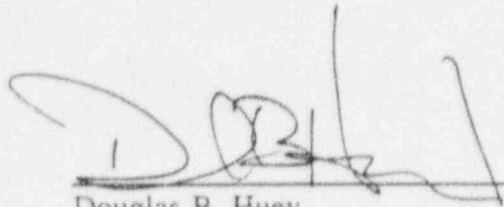


7. 1994 "PSL Annual Radiological Environmental Monitoring Report", PSL Units 1 & 2"
8. 1994 "PTN Annual Radiological Environmental Monitoring Report", PTN Units 3 & 4"
9. 1984 Radiological Environmental Surveillance Agreement between the State of Florida Department of Health and Rehabilitative Services and Florida Power & Light, previously expired
10. DHRS Quarterly Report of the FPL Radiological Surveillance of Turkey Point and St. Lucie Nuclear Sites for the first quarter of 1994
11. PSL evaluation for the Steam Generator Repair Report, PSL-1, "Environmental Aspects of the Replacement Project"
12. PSL Administrative Procedure, AP 0010510, "Best Management Practices/Pollution Prevention Program"
13. L-95-180, June 17, 1995, "NRC NPDES Permit notification"
14. JNO-HP-95-017, May 17, 1995, "Request to add PTN canal seaweed to the REMP sample locations"
15. ENG-QI 1.0, Revision 1, 10/20/94, "Design Control"
16. L-95-127, April 27, 1995, "1994 PSL Annual Environmental Operating Report" NRC notification letter
17. L-95-113, April 19, 1995, "Annual Radiological Environmental Operating Report for Calendar Year 1994" NRC notification letter
18. L-95-150, May 16, 1995, "PSL NPDES Permit FL0002208 Modification" NRC notification
19. L-95-130, April 21, 1995, "PTN NPDES Permit Renewal" NRC notification letter
20. NP-915, "Pollution Prevention Waste Minimization" Nuclear Policy
21. PTN Condition Report 95-344, "Failure to submit copy of NPDES permit to NRC"
22. L-94-296, November 22, 1994, "PSL Non-routine Environmental Event" NRC notification
23. L-94-316, December 8, 1994, "PSL Non-routine Environmental Event" NRC notification
24. L-94-228, August 31, 1994, "PSL NPDES Permit Modification Request" NRC notification
25. Department of Environmental Protection Marine Turtle Permit, TP #099, Expiration date: January 31, 1996, issued to Dr. Johnathan Gorham.
26. Letter 95-002, "Sea Turtles," Instruction to PSL security personnel concerning intake canal monitoring
27. "Surveillance of St. Lucie Intake Wells During Period of Increased Turtle Activity," dated January 9, 1995, from Nick Whiting
28. JPN-ST-90-045, November 13, 1995, "Compliance with Environmental State, and Local Permit Requirements and Regulations"



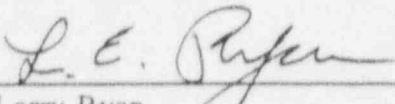
## Signatures

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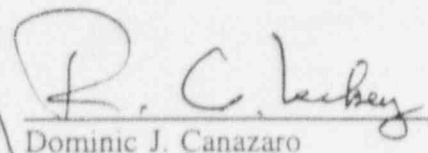
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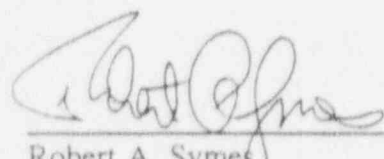
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Date

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## **Audit Distribution**

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