



**Florida  
Power**  
CORPORATION

August 12, 1988  
3F0888-11

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License DPR-72  
Inspection Report 87-39-00  
Revised Response

Dear Sir:

As indicated in our violation response on January 14, 1988 to the above inspection report, attached is Florida Power Corporation's revised response to confirm the cause and corrective actions taken.

Should there be any questions, please contact this office.

Yours very truly,

Rolf C. Widell  
Director, Nuclear Operations Site Support

WLR:mag

Att.

xc: Regional Administrator, Region II  
Senio: Resident Inspector

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FLORIDA POWER CORPORATION  
REVISED RESPONSE  
INSPECTION REPORT 37-39

VIOLATION 87-39-01

10CFR 20.311(d)(1) requires any generating licensee who transfers radioactive waste to a land disposal facility to prepare all wastes so that the waste is classified according to 10 CFR 61.55 and meets the waste characteristic requirements in 10 CFR 61.56.

10 CFR 61.56(b)(2) states that liquid wastes or wastes containing liquid, must be converted into a form that contains as little free standing and noncorrosive liquid as is reasonably achievable, but in no case shall liquid exceed 0.5% of the volume of the waste for waste processed to a stable form.

Contrary to the above, on June 8, 1987, one 55-gallon drum of phosphoric acid processed to a stable form using cement was transferred to a land disposal facility as a part of Radioactive Waste Shipment No. 0687-019-A. Upon receipt at the land disposal facility, the drum was found to contain 1,585 milliliter of liquid (approximately 0.7%).

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

RESPONSE

Florida Power Corporation's Position

Florida Power Corporation (FPC) accepts the violation.

Apparent Cause of Violation

Florida Power Corporation investigated the activities associated with the solidification of the phosphoric acid which resulted in the above referenced violation. The investigation identified pH drift and impurities to be likely reasons for some of the problems. In addition, during the laboratory test, the remaining bag of solidification media used for the solidifications was found to have deteriorated. The test specimen exhibited the same characteristics as the failed solidified drum. This appears to be the main cause of the failure. The deteriorated solidification media was within the manufacturers stated shelf life of six months, and was utilized in the full scale solidification of the phosphoric acid. The Process Control Program (PCP) did not identify this problem because the test solidification performed in accordance with the PCP utilized a single bag of solidification media for all tests. Since the remaining bags were within the stated shelf life and no indications of this type problem had been identified in the past, it was assumed the tests were representative of the entire solidification process.

Corrective Action

Solidified waste shipments were discontinued.

Date of Full Compliance

Full compliance was achieved by discontinuing shipments of solidified waste beginning June 1987.

Actions Taken to Prevent Recurrence

Retraining of the Nuclear Waste Systems Technicians and Supervisors responsible for the waste solidification process was performed. The training addressed identification of the potential problems associated with the solidification process including the testing of the media used for each batch of waste.

The procedure that governs the waste solidification operation has been changed to alleviate the problems that occurred during this solidification. Instead of an instruction for all waste, this change added specific instruction for each type of waste solidified and the testing of the solidification media to be used in solidifying each batch of waste. The procedure was revised June 10, 1988 for Environment Class A Unstable Solidifications.