DMB

Florida Power
CORPORATION

October 28, 1986
3F1086-23

Dr. J. Nelson Grace
Regional Administrator, Region II
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
NRC Inspection Report No. 86-06
Revised Response

Dear Sir:

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

Sincerely,

E C Simpson

E. C. Simpson
Director, Nuclear Operations
Engineering and Licensing

AEF/feb

Attachment

IE01

FLORIDA POWER CORPORATION
REVISED RESPONSE
INSPECTION REPORT 86-06

VIOLATION 86-06-01

Technical Specification 6.12.1.a stated that a High Radiation Area in which the radiation intensity is greater than 100 mrem per hour but less than 1000 mrem per hour shall be barricaded and conspicuously posted as a High Radiation Area and entrance shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.

Contrary to the above, on January 28, 1986 a radiation worker was present in the Triangle Room, a posted High Radiation Area with dose rates up to 350 mrem per hour, and did not possess a radiation monitoring device which continuously indicated the radiation dose rate in the area.

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

RESPONSE

1. FLORIDA POWER CORPORATION'S POSITION

   Florida Power Corporation agrees the violation occurred as stated.

2. APPARENT CAUSE

   The cause of this violation is attributed to an isolated occurrence of failure to follow procedure.

   This determination was made as the result of an interview conducted with the employee following the incident. During the course of this interview, the employee freely admitted that he was aware of all the requirements for entry into a High Radiation Area, including the requirement for a dose rate monitoring device, which at the time of the violation was located at the entrance to the High Radiation Area.

   The area had just been surveyed by the Health Physics staff, and the dose rate in the area occupied by the employee was approximately 10 mrem/hour. The employee was in the area for approximately one minute.

3. CORRECTIVE ACTION

   Immediate corrective action was to remove the individual from the High Radiation Area.

4. CORRECTIVE ACTION TO PREVENT RECURRENCE

   The individual involved was disciplined by his supervision.

5. DATE OF FULL COMPLIANCE

   FPC was in full compliance as of January 29, 1986 when disciplinary actions were completed.

VIOLATION 86-06-02

10 CFR 20.311 required that any licensee who transfers radioactive waste to a land disposal facility to prepare all wastes so that they are classified according to 10 CFR 61.55.

10 CFR 61.55(a)(8) stated that the concentration of a radionuclide may be determined by indirect methods such as the use of scaling factors which relate the inferred concentration of one radionuclide to another nuclide that is measured if there is reasonable assurance that the indirect method can be correlated with actual measurements.

Contrary to the above, on September 26, 1985 and January 23, 1986 compacted dry active waste was shipped, the waste classification of which was determined, based on scaling factors derived from radionuclide ratios in reactor coolant, without reasonable assurance that the radionuclide distribution of dry active waste could be correlated to actual measurements of reactor coolant.

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

RESPONSE

1. FLORIDA POWER CORPORATION'S POSITION

   Florida Power Corporation (FPC) concurs that reasonable assurance was not shown to the Inspector that the radionuclide distribution of dry active waste could be correlated to actual measurements of reactor coolant.

2. APPARENT CAUSE OF VIOLATION

   This violation was caused by a misunderstanding concerning what data analysis is necessary to provide reasonable assurance that the RCS activity can be correlated to dry active waste activity.

3. CORRECTIVE ACTION

   FPC will perform additional analyses to validate whether the RCS activity can or cannot be correlated to the dry active waste activity. This analysis will include comparing the Gamma activity to weekly composite smears from accessible contaminated areas to the Gamma activity of the RCS for the same period of time.

   While awaiting the results of the analysis, Florida Power will continue with our current practices for classifying dry active wastes.

4. DATE OF FULL COMPLIANCE

   Full compliance will be achieved when a sufficient number of data points are collected to demonstrate whether the RCS can or cannot be correlated to dry active wastes. If reasonable assurance cannot be demonstrated, then other indirect methods will be implemented.

5. ACTION TAKEN TO PREVENT RECURRENCE

   The above corrective action will be sufficient to prevent recurrence.

SUPPLEMENTAL INFORMATION

Item 1, of Enclosure 1 to your September 29, 1986, letter referenced an apparent failure to have a proceduralized method in place for determining radionuclide concentrations on dry active waste by use of scaling factors. On April 29, 1986, the applicable procedure was changed to require the proper methodology.