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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C      05000251  
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 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC ltr re violations noted in Insp Repts  
 50-250/90-08 & 50-251/90-08.

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JULY 03 1990

L-90-238  
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Reply to Notice of Violation  
NRC Inspection Report 90-08

Florida Power & Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response is attached.

Very truly yours,

*J. H. Goldberg*  
J. H. Goldberg  
President  
Nuclear Division

JHG/GRM/sh

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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PDR ADOCK 05000250  
Q PDC

*JHG*  
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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 90-08

I. FINDING 50-250,251/90-08-01

"Technical Specification 6.11 requires procedures for personnel radiation protection to be prepared consistent with the requirements of 10 CFR 20 and to be adhered to for all operations involving personnel radiation protection exposure.

Licensee procedure 0-HPA-002, Requirement for Entry and Work in the RCA, dated July 14, 1989, requires all personnel working in areas under a Radiation Work Permit (RWP) to read and to comply with all instructions, requirements, and remarks listed on the RWP..

RWP 90-4015, Unit 3 (U3) Containment 58 foot (58') and 30' 6" Elevations - Replace/Repair/Maintain/Modify the Normal Containment Cooler System and Motors, dated February 1, 1990, requires that prior to entering the Radiologically Controlled Area (RCA) each individual discuss the scope of work with the Health Physics Shift Supervisor (HPSS) and notify the Work Area Health Physics (HP) technician prior to starting work.

Contrary to the above, during the period March 26-28, 1990, selected workers entered the U3 Containment and initiated work on the "C" Containment Cooler System without contacting the HPSS nor the Containment Work Area HP technicians.

1. ADMISSION OR DENIAL OF THE VIOLATION:

FPL concurs with the finding.

2. THE REASON FOR THE VIOLATION:

The cause of this event was personnel error. The RWP instructions were very clear and precise concerning the requirements for this job.



Contract personnel working in the Unit 3 containment, even though they had been trained to abide by the requirements of RWPs, failed to contact the HPSS and the Work Area HP technician as required by the RWP. The requirement to contact the HPSS and Work Area HP technician was necessary because of the potential for changes in the dose rate in the work area which could occur after movement of the reactor head.

3. THE CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

- a. An HP technician observed the workers in an area potentially affected by the relocated reactor head and immediately ordered them to vacate the area. The technician informed the workers that the potential dose rate for the area had changed from 1 - 2 millirem per hour to 25 - 50 millirem per hour. Examination of the self-reading dosimeters for all workers using the RWP during the week of March 26, 1990, determined that the maximum exposure for a single entry was 20 millirem. Thus none of the workers received an excessive dose.
- b. The RWP "Entry Log," form HP-1.1, was revised to instruct the worker signing in on the RWP to notify HP prior to the start of work activities. This will provide additional emphasis to the workers concerning the importance of this requirement as well as serve as an additional reminder.
- c. In addition, the Health Physics Department conducted an informal random survey of personnel from the various groups to determine worker knowledge and compliance with RWPs. Based on this survey, several craftsmen did not have complete knowledge of the RWP they were working under. The supervisor of this group of personnel was notified by HP of this shortcoming. A memo issued by the supervisor of the group emphasized the importance of following the RWPs and advising his personnel of possible disciplinary actions that could result from violations of the RWPs.



4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

- a. The Health Physics Department will establish a spare copy file of active RWPs for job supervisors and foremen. This will facilitate the use of RWPs in the field.
- b. The Training Department will revise applicable lesson plans to provide special emphasis on RWP compliance during Radiation Worker Training.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

- a. Corrective action 4.a. will be completed by October 1, 1990.
- b. Corrective action 4.b. will be completed by August 31, 1990.

II. FINDING 50-250,251/90-08-05

"10 CFR 20.203(e) requires each area in which licensed material is used or stored and which contained any radioactive material in an amount exceeding ten times the quantity of such material specified in Appendix C of this part to be posted with a sign or signs bearing the radiation caution symbol and the words: "Caution, Radioactive Material(s)."

Contrary to the above, on May 2, 1990, the licensee failed to maintain adequate visible posting for a radioactive waste bin storage area located adjacent to, and north of the old Compactor Waste Building.

1. ADMISSION OR DENIAL OF THE VIOLATION:

FPL concurs with the finding.

2. THE REASON FOR THE VIOLATION:

This event was caused by personnel errors. Plant non-licensed personnel moving trash into the storage area failed to restore a rope barrier with postings. In addition, trash bins had been positioned in front of some postings.





3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

- a. The rope barrier was restored and postings were moved such that they would not readily be blocked by moving trash bins.
- b. This event and other potential problem areas were reviewed in crew meetings with applicable Health Physics and Maintenance personnel.
- c. Routine surveillances have been established to check radiological postings. These surveillances will ensure postings are in compliance.
- d. The Training Department is increasing the emphasis on radiological postings in Radiation Worker Training.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

No additional corrective actions are considered necessary.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The required barriers and postings were restored on May 2, 1990.

