Florida Power
CORPORATION

30 October 1979
3-0-3-a-2
CS-79-318

Mr. J. P. O'Reilly, Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 3100
Atlanta, GA 30303

Docket No. 50-302
License No. DPR-72
Ref: RII:BRM
50-302/79-39

Dear Mr. O'Reilly:

We offer the following response to the apparent Items of Noncompliance in the referenced inspection report.

NOTICE OF VIOLATION

As required by Technical Specification 3.1.2.8, "Thermal Power shall not be increased above the power level cutoff... unless Xenon reactivity is within 10% of the equilibrium value for rated thermal power and is approaching stability." This Specification also requires action to be taken to reduce thermal power to equal-to or less-than the power level cutoff within fifteen minutes of discovery that the specification cannot be met.

Contrary to the above, on September 17, 1979, thermal power was above the power level cutoff for approximately 64 minutes after discovery of the condition.

Response: As discussed in LER 083/01T-0 the following changes have been put into effect to prevent future incidents of this type:

a. OP-204, Power Operation, has been revised to include holdpoints for heat balance calculations during power ascension.

b. SP-113, Power Range Nuclear Instrumentation Calibration has been revised to require verification of redundant FW flow transmitter signals (SP-8A-DPT-1 and DPT-2; SP-8B-DPT-1 and DPT-2) prior to performing heat balance calculations.

c. All supervisory operations personnel have been instructed to follow the more/most conservative action statement applicable in a given situation.

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d. A comparison of online/offline computer heat balance calculations indicated no apparent discrepancy in the IBM-5100 computer program. Nevertheless, an instruction has been issued to require independent verification by a second IBM-5100 operator whenever the IBM-5100 is used in heat balance calculations. Results will be compared for accuracy and consistency prior to use in determining power level or calibrating nuclear instrumentation.

Full compliance has been achieved.

Should there be any questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION

W. P. Stewart

W. P. Stewart
Manager, Nuclear Operations

L. C. Lutzehaus for
Nuclear Plant Manager

JC/rc

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