

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30303

keport No.: 50-302/78-31

Docket No.: 50-302

License No.: DPR-72

Licensee: Florida Power Corporation 3201 34th Street South St. Petersburg, Florida 33733

Facility Name: Crystal River 3

Inspection at: Crystal River Site, Crystal River, Florida

Inspection conducted: December 11-14, 1978

Inspector: D. R. Quick,

Approved by:

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H. C. Dance, Chief Reactor Projects Section No. 1 Reactor Operations and Nuclear Support Branch

Inspection Summary

Inspection on December 11-14, 1978 (Report No. 50-302/78-31)

Areas Inspected: Routine, unannounced inspection of plant operations; follow-up on previous noncompliance items and unresolved items; follow-up on licensee events, and a plant tour. The inspection involved 27 inspectorhours onsite by one NRC inspector.

Results: No items of noncompliance were identified in three of the four areas inspected. One item of noncompliance was identified in one area (Deficiency - Failure to follow procedures (78-31-01 - paragraph 1.5.d).

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DETAILS I Prepared by: HC Dame

D. R. Quick, Reactor Inspector Reactor Projects Section No. 1 Reactor Operations and Nuclear Support Branch

Dates of Inspection: December 11-14, 1978

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Reviewed by: H. C. Dance, Chief Reactor Projects Section No. 1 Reactor Operations and Nuclear Support Branch

1. Persons Contacted

Florida Power Corporation (FPC)

- *G. P. Beatty, Jr., Nuclear Plant Manager
- *W. R. Nichols, Operations Superintendent
- *P. F. McKee, Technical Services Superintendent
- G. M. Williams, Compliance Plant Engineer
- K. O. Vogel, Operations Engineer
- J. N. Hessinger, Compliance Auditor
- *J. Cooper, Jr., Compliance Engineer
- *L. A. Hill, Compliance Auditor
- J. R. Wright, Chem Rad Protection Engineer

Various Operations and Maintenance Personnel

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

The inspector reviewed various open items, unresolved items, and licensee responses to items of noncompliance. The status on these items is indicated below:

- a. (Closed) Unresolved Item 76-24/2 (Paragraph I.6 of RII Report 76-24): Inservice Inspection Program not in accordance with Technical Specification 4.0.5. The Inservice Inspection Program, developed in accordance with the ASME Boiler and Pressure Vessel Code, Section 11.0, 1974 Edition through Summer 1975 Addenda, was submitted to NRR in November, 1977 and has been implemented at the plant. The inspector has no further questions at this time.
- b. (Closed) Unresolved Item 7-6/2: Loss of Power to the ICS. This item was reviewed by the inspector and documented in Region II

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Reports 77-25, 78-10, and 78-21. Installation of the modification package, MAR 77-10-09, has been completed and the inspector has no further questions at this time.

- (Open) Unresolved Item 77-18/1 (Paragraph I.5 of RII Report C. 77-18): Heat Balance Calculations and Nuclear Instrumentation Calibration Discrepancies. This concern stemmed from the potential for a nonconservative nuclear instrumentation error of as much as two percent to go uncorrected in accordance with present procedures. The inspector discussed this concern with the licensee during this inspection and the licensee committed to revise Surveillance Procedure, SP-113, in the following manner: 1) The "as found" allowable error will remain at plus or minus two percent and ; 2) The "as left" allowable error will be changed to be zero or positive. This will require the nuclear instrumentation to be recalibrated if any negative error exists at the time the surveillance is performed. SP-113 is performed on a daily basis. The inspector feels this action will be adequate to eliminate the concern and will review implementation of this commitment during a future inspection.
- d. (Closed) Unresolved Item 78-02-02 (Paragraph I.3 of RII Report 78-2): General Housekeeping Procedures. The inspector reviewed this item with the licensee and determined that Administrative Instructions, AI-500 and AI-600, have been revised to provide guidance in this area and the provisions are presently being implemented. The inspector has no further questions at this time.
- e. (Open) Unresolved Item 78-19-01 (Paragraph I.3 of RII Report 78-19): Fuel Pool Missile Shield Replacement. The inspector discussed this item ith the licensee and informed him that a twenty-four hour period of maintenance or fuel handling inactivity is currently considered to be reasonable, by NRR, and that missle shield replacement should start within that time period. The licensee stated that one of the two following courses of action would be taken: (1) Revise procedures to ensure that the twentyfour hour criteria is met, or; (2) Sub sit a Technical Specification change proposal to relieve the replacement requirement. The inspector will review this item during future inspections.
- f. (Closed) Unresolved Item 78-21-02 (Paragraph II.5.a.(1) of RII Report 78-21): Nonconforming Operations Report Review Documentation. Compliance Procedure CP-111 has been revised to require documentation, to support the reportability determination, to accompany the NCOR in cases involving unplanned releases of radioactivity. The inspector has no further questions at this time.

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- g. (Closed) Infraction 78-21-01 (Paragraph I.5 of RII Report 78-21): The inspector reviewed and observed implementation of the revisions to AI-500 and AI-600 which place responsibility for housekeeping with the master mechanic during maintenance and the shift supervisor for all operational areas. The inspector has no further questions at this time.
- 3. Unresolved ltems

None

4. Exit Interview

A meeting was held by D. R. Quick with G. P. Beatty, Jr., and members of his staff on December 14, 1978. Items covered by this inspection were discussed including a new noncompliance item concerning the Clearance Log (see paragraph 5.d.). The licensee indicated corrective action would be taken. During the course of the exit interview, the licensee made a commitment to revise SP-113 to eliminate the concern expressed in Unresolved Item 77-18/1 (see paragraph 2.C).

5. Review of Plant Operation

As part of a general review of plant operations, the inspector reviewed the following areas for noncompliance with Technical Specifications and Administrative requirements:

- Control Room Operator's Log
- Shift Supervisor's Log
- Short Term Instructions
- Equipment Clearance Order Log
- Non Conforming Operation Reports
- Control Room Operations
- Plant Tour

a. Control Room Operator's Log

The inspector reviewed this log for the period, 11/27-12/11, 1978. No discrepancies were identified for this period.

b. Shift Supervisor's Log

The inspector reviewed this log for the peirod, 11/15-12/12, 1978. No discrepancies were identified for this period.

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c. Short Term Instructions

The inspector reviewed all current Short Term Instructions. No discrepancies were identified.

d. Equipment Clearance Order Log

The inspector reviewed this log for the period 10/1 - 12/11, 1978. Twenty discrepancies were identified and are detailed below:

- (1) Clearance Order 10-001 had been released in the log index however, the Clearance Order itself was still located in the active portion of the log and had not been released. Investigation revealed it should have been properly released on 10/10/78 when work request 277.1 was completed. This was associated with waste evaporation level channel calibration.
- (2) The following e ghteen Clearance Orders had been released and were located in the inactive file, however, they had not been released in the log index; 10-091, 10-130, 10141, 10-145, 10-185, 10-189, 11-001, 11-002, 11-008, 11-032, 11-038, 11-040, 11-041, 11-071, 11-077, 11-114, 12-024, and 12-034.
- (3) Clearance Order 10160 had not been released in the log index and the Clearance Order itself could not be located during the course of this inspection.

The inspector discussed with the licensee, the importance of this log being maintained accurately since it is a source of information to apprise operations personnel of the current plant equipment status. The inspector also expressed his concern to the licensee, that the operations personnel reviews of this log, throughout the period indicated, failed to identify these discrepancies.

The discrepancies outlined above constitute a single noncompliance classified as a deficiency (Failure to Follow Procedure -78-31-01).

e. Non Conforming Operation Reports

The inspector reviewed all NCOR's initiated during the period 10/1 - 12/12, 1978 which were determined by the licensee to be non-reportable. One discrepancy was identified wherein NCOR 78-281 should have been reported but, was not due to a misinterpretation of the Technical Specification requirement applicability to this area. The NCOR addressed a sticking "M" relay in the Engineered Safeguards Actuation System which was not associated with an actuation instrumentation channel. This failure would not have prevented actuation; therefore, since the Technical Specifications address actuation channel operability specifically as the Limiting Condition for Operation, this event was inadvertantly evaluated to be non-reportable. However, the inspector determined that the relay in question is necessary for the system to function properly following actuation. It is one of three Bypass - Reset relays, two of which must be actuated, to allow the system to be realligned for the longterm recirculation mode of operation following an event. The actuation system is, therefore, in a degraded mode with the relay in question inoperable and would not be capable of performing it's intended function if the single failure criteria was applied. These points were clarified with the licensee during the exit interview. The licensee stated that he agreed with the inspector's determination and that a report detailing the event would be submitted to the NRC. In addition, he stated that a more careful evaluation of the NCOR's would be made in the future to prevent recurrence of this type situation.

f. Facility Tours and Observations of Control Room Activities

The inspector toured various areas of the Crystal kiver 3 facility to observe plant activities in progress, and to ascertain the general state of cleanliness and housekeeping. The inspector observed portions of plant activities on a daily basis that included two shifts. The inspector observed portions of control room activities at various times during the inspection. The inspector interviewed operations watchstanders, reviewed selected annunciators and plant instrumentation, and verified compliance with Technical Specifications requirements.

The inspector also witnessed operations personnel handling two events while in progress. One was a partial loss of feedwater with the plant at high power and the second was an intermittent failure of one control rod absolute position indicator.

No discrepancies were identified.

6. Review of Licensee Event Reports

The inspector reviewed selected LER's for consistency with the requirements of the Technical Specifications and Regulatory Guide 1.16 (Reporting of Operating Information - Appendix A Technical Specifications). The inspector examined the licensee's analysis of the event, the corrective action taken, and discussed the LER with licensee representatives. The following LER's were reviewed:

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a. LER 78-053 Decay Heat Control Valve (DHV-110) Inoperable

This LER was generated due to the flow transmitter which controls DHV-110 being isolated from the Decay Heat System. Responsibility for this event could not be established. The inspector emphasized the importance of using procedures during system alignments and maintenance and also the requirement to retest equipment following maintenance. This LER is closed.

b. LER 78-054 Cable Spreading Room Penetrations Not Sealed

This LER is closed without comment (See RII Report 78-24).

c. LER 78-055 MUP3-C Backup Lube Oil Pump Inoperable

No explanation for this event could be found when circuits were checked. Fuse was replaced and pump tested satisfactorily. This LER is closed.

d. LER 78-057 Boric Acid Tank Valves Closed

The inspector reviewed revisions to OP-403 which clarified valve alignment for recirculation/restoration and also reviewed Short Term Instructions dealing with recirculation. The inspector has no further questions at this time. This LER is closed.

7. Environmental Reports From Licensees

The inspector discussed the requirements for reporting environmental information, with the licensee, in accordance with the NRR request, dated, October 27, 1978. The licensee states that he understood the requirements and, that he had been, and will continue to, supply the necessary information.