



31 May 1977  
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CS-77-96

Mr. Norman C. Moseley, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
230 Peachtree St., N.W., Suite 818  
Atlanta, Georgia 30303

Docket No. 50-302  
License #DPR-72  
Ref: IE:II:FJ  
50-302/77-5

Dear Mr. Moseley:

We offer the following amplification of our response, dated 25 April 1977, to the Infraction cited in the referenced Inspection Report.

"Infraction - Change to Test Program Commitment

Contrary to the requirements of 10 CFR 50.59(b), a written safety evaluation was not performed to determine that the unreviewed safety question did not exist when the reactivity coefficients at power test was deleted from the 15 percent power ascension test program. Table 13-4 of the PSAR states that this test will be performed at incremental power levels."

Subsequent to our discussions surrounding this issue, the Plant Review Committee review of the test procedure has been performed including a safety analysis in accordance with the requirements of 10 CFR 50.59(b). This evaluation determined that the deletion of the test at 15 percent power did not constitute an unreviewed safety question.

The development, review, and performance of the test procedure in question were under the aegis of the test program. Plant procedures and changes thereto receive a documented safety evaluation which reflects the specific requirements of 10 CFR 50.59(b), therefore, this apparent lapse will not recur.

Should you have any questions concerning this issue, we will be glad to discuss them with you.

Very truly yours,

FLORIDA POWER CORPORATION

*W. P. Stewart*

W. P. Stewart  
Director, Power Production

DWP/feh

*[Signature]*  
Nuclear Plant Manager

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