



7 February 1978

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CS-78-41

Mr. J. P. O'Reilly, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
230 Peachtree St. N.W., Suite 818  
Atlanta, GA 30303

Docket No. 50-302  
License No. DPR-72  
Ref: RII: ALC  
50-302/77-26

Dear Mr. O'Reilly:

We offer the following response to the apparent items of non-compliance noted in the referenced Inspection Report.

- A. Appendix B Technical Specification 5.3 requires auditing implementation of environmental monitoring and surveillance programs and auditing conformance to procedures and Environmental Technical Specification requirements. Audits shall be conducted at least once per year and shall also include contractor operations.

This Deficiency was directed at three areas of our annual audit:  
1) Implementation of environmental monitoring and surveillance programs; 2) Conformance with procedures and Environmental Technical Specification requirements; and 3) Contractor operations.

With regard to Items 1&2, at the time of the audit, it was our opinion that sufficient questions, as evidenced by the checklist for the audit, were asked to verify these two areas. However, since the checklist does not accompany the audit itself, the inspector was not aware of their scope. In addition, Section 5 of our audit (QP-139) contained a statement that did not adequately reflect the scope of the audit. We wish to clarify that the statement was only meant to indicate that we had not looked at the technical areas of the program and, therefore, could not verify what we call general compliance.

Regarding Item 3, we have scheduled an audit of contractor operations.

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As to future activities, we are taking the following actions.

1. Future audits on in-house activities with regard to Environmental Technical Specifications will cover a greater scope of activities and will utilize personnel familiar with the Technical aspects of the referenced document.
2. Audits of contractor operations related to Environmental Technical Specifications will be performed in accordance with the frequency stated in the Technical Specifications.

Full compliance for Items 1&2 of the referenced Deficiency will be achieved by October 1, 1978, at which time the next annual audit will be conducted. Full compliance to Item 3 will be implemented by April 30, 1978, at which time the audit of contractor operations will have occurred.

- B. Appendix B Technical Specification 5.5.1 requires the preparation and approval of written procedures, including detailed check-off lists and instructions for implementation of the monitoring requirements described in Section 2 and 3. All procedures and changes to procedures utilized by contractors to implement the environmental monitoring programs described in Section 3 shall be reviewed and approved by the Manager of Nuclear Operations.

Contrary to the above, the licensee failed to provide procedures for Technical Specification 2.1.1 (Condenser Delta T) and to review and approve procedures utilized by contractors to implement nonrad monitoring programs described in Section 3 of the Specifications.

The personnel with whom the inspector communicated during the inspection in question unfortunately are not those who perform the surveillance subject to Appendix B Technical Specification 2.1.1 (Condenser Delta T) For this reason, the inspector was not apprized of the fact that this Specification is met in several manners.

The Control Room computer does monitor the RTD's in the condenser inlet and outlet water boxes and it will alarm at 17.5°F and 21°F maximum.

The condenser inlet and outlet water box temperatures are printed each hour on the Crystal River Unit #3 Unit Daily Log, and this log is checked once per shift per approved Surveillance Procedure SP-300.

Whenever the RTD's or computer are inoperable during power operation above 80% Rated Thermal Power, the condenser Delta T is determined every two hours utilizing local temperature indicators on each water box per SP-300.

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We feel that the aforementioned methods of surveillance which are performed according to approved procedures are sufficient to resolve this portion of the Item.

The procedures utilized by contractors to implement the nonradiological environmental monitoring programs of Section 3.1.1, 3.1.2, 3.1.3, and 3.1.4 were not reviewed and approved by the Manager, Nuclear Operations (now the Manager, Nuclear Support Services). The procedures were reviewed and approved by members of the Environmental and Licensing Affairs Department which is responsible for the implementing of the above-referenced monitoring programs.

To avoid further noncompliance, the Director, Environmental and Licensing Affairs has been given the authority to review and approve the procedures of the contractors used to implement the monitoring programs for which he is responsible. He will notify the Manager, Nuclear Support Services of any discrepancy found in the programs.

The procedures will be properly reviewed and approved within sixty days of this reply.

We believe the foregoing to be adequately responsive to the inspector's findings. Should there be further questions regarding these responses, please contact us.

We find no proprietary information in the referenced Inspection Report.

Very truly yours,

*W.P. Stewart*

W. P. Stewart  
Director, Power Production

DWP/rc

*P.J. Mc*  
for Nuclear Plant Manager