



**Florida
Power**
CORPORATION

February 5, 1976

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Nuclear Regulatory Commission
Region II, Suite 818
230 Peachtree Street, NW
Atlanta, GA 30303

Subject: 50-302/75-19

Dear Mr. Moseley:

Regarding your inspection report, we wish to reply to the Enforcement Matters as detailed therein.

Your Item A; infraction regarding Eddy Current Testing, as described in Details, IV, Paragraph 3, of your report. Our response to the four items detailed in this report is to revise procedure SP-305 incorporating the required information as detailed below.

Your Item A: Acceptance Criteria - No quantitative acceptance criteria are contained in the procedure with regard to tube wall thinning or through wall defects.

Reply: Acceptance criteria have been extracted from Crystal River Unit 3 Standardized Technical Specifications and will become a part of procedure SP-305. It should be noted that in no case was any tube tested found to be below the thickness or condition requiring plugging as specified in Technical Specifications and revised SP-305.

Your Item B: Test Parameter - Significant test variables such as tape recorder speeds, test frequencies and probe speeds are not specified in the procedure.

Reply: All required test parameters are being incorporated in the revision to SP-305. We are in receipt of a letter from the contractor which states that all of these parameters are identical to as-performed inspections for all work they have performed on eddy current inspection of steam generator tubes at Crystal River Unit 3.

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Your Item C: Applicability - Appendix B of Z-QA-301 applies to Westinghouse steam generators. Crystal River 3 is a B&W system.

Reply: Reference to Westinghouse steam generators has been deleted.

Your Item D: Calibration Drift - Procedure does not require retest of tubes examined during an interval wherein calibration has drifted.

Reply: Procedure SP-305, as revised, requires that, if the equipment is found to be out of calibration, it will be recalibrated and tubes inspected since the previous calibration will be retested.

We consider the above measures to be the necessary disposition to resolve this infraction. All inspections in question have been performed in accordance with the procedure SP-305 including these revisions. We believe that the revision to SP-305 provides the necessary corrective action to preclude further recurrence. Final approval of the revised SP-305 should occur prior to February 15, 1976 and will then constitute full compliance.

Your Item B; deficiencies regarding failure to follow administrative instructions, Details I, Paragraph 2; and failure to report the failure of the auxiliary building ventilating duct, Details I, Paragraph 3, we wish to reply as follows:

Regarding the failure to follow administrative instructions:

Item a(1) - Field Change No. 1 dated September 29, 1975, to TP 7 1 451 8, Electrical and Functional Test of 120V AC and Regulated Instrument 120V AC Systems, was not reviewed by the TWG within 14 days.

Reply: Field Change #1 (Addendum E) was written sometime after the test was performed to correct a typo found during the Test Results Review and mistakenly filed with the Test Results. When found during the TWG Review, it was reviewed and approved on 10/23/75.

Item a(2) - An unnumbered field change dated November 27, 1974, which changed step 9.2.1.74 of TP 7 2 451 10, DC Power System Electrical Test, had not been reviewed by the TWG at the time of this inspection. Further, the Manager-Generation Testing had not approved the change. The test results review cycle had been completed.

Reply: When this requirement was imposed, the GT-41's were removed from completed TP's and sent to TWG for review in an effort to backfit. This GT-41 was missed in the initial effort and not caught in the TWG review of the TP because GT-41 review and approval is now handled separately.

The GT-41 in question has subsequently been reviewed by TWG and approved on 1-7-76.

This error occurred during a change in procedures for handling GT-41's and is not likely to recur. In addition, Data Collection personnel have been instructed to look for any other unreviewed GT-41's and if any are found, they will be closed in a similar manner.

Item b(1) - The test procedure log for TP 7 1 451 8 indicates that a deviation report was filed on November 15, 1974, to permit the performance of procedure step 9.2.1.2.10 prior to step 9.2.1.2.9. This deviation report was not contained in the test data package.

Reply: The TP log indicates a Sequence Deviation Report was filed on 11/15/74. This Sequence Deviation was discarded because the procedure was returned from the field and revised on 12/9/74. When Testing was restarted on 12/12/74, the entire test was started over with 9.2.1.2.9 performed in sequence.

Item b(2) - One addendum to TP 7 1 451 8 contained twenty field changes. The dates contained in the test data package indicate that these changes were not performed in sequence and deviation reports to justify out-of-sequence changes were not contained in the procedure package. Changes 1 through 7 were performed on January 3, 1975; Changes 8 and 9 were performed on December 13, 1974; Changes 10, 11, 12, 19 and 20 were performed on December 12, 1975*; and Changes 13 through 18 were performed on December 11, 1975*. Failure to follow administrative instructions is considered to be a deficiency.

Reply: *NOTE: Changes 10 through 20 were performed in 1974 instead of 1975 as indicated in IE Report 50-302/75-19.

These GT-41's (Addendum "D") were written before the requirement for numbering changes was imposed by a memo dated 2-12-75. The numbers on these GT-41's were added after that date as an attempt to backfit and do not reflect the sequence in which they were written or performed.

The following list shows when the changes on Addendum "D" were written, what steps were affected, and when the steps were performed. Note that the same change number can be used for changes in several locations in the Test Procedure. Also note that the steps revised were all performed after the revisions were written and that all steps were performed in sequence or deviation from sequence was covered by a sequence deviation.

<u>CHANGE NUMBER</u>	<u>DATE WRITTEN</u>	<u>STEP AFFECTED</u>	<u>DATE STEP PERFORMED</u>
13	12/11/74	9.2.2.2.3	12/16/74
14	12/11/74	9.2.2.2.6	12/16/74
15	12/11/74	9.2.5.2.3	12/23/74
16	12/11/74	9.2.3.2.6	12/23/74
17	12/11/74	9.2.4.2.3	12/17/74
18	12/11/74	9.2.4.2.6	12/17/74

<u>CHANGE NUMBER</u>	<u>DATE WRITTEN</u>	<u>STEP AFFECTED</u>	<u>DATE STEP PERFORMED</u>
10	12/12/74	9.2.1.6.13	12/12/74
		9.2.2.6.13	12/16/74
		9.2.3.6.13	12/23/74
		9.2.4.6.13	1/2/75
11	12/12/74	9.2.1.6.1	12/12/74
		9.2.2.6.1	12/16/74
		9.2.3.6.1	12/23/74
		9.2.4.6.1	12/17/74
12	12/12/74	8.2.1	12/12/74
19	12/12/74	9.2.1.8.4	12/13/74
20	12/12/74	9.2.3.9.5	12/26/74
8	12/13/74	9.2.1.8.9	12/13/74
		9.2.2.8.9	12/16/74
		9.2.3.8.9	12/26/74
		9.2.4.8.9	1/3/75
9	12/13/74	9.2.1.8.10	12/13/74
		9.2.2.8.10	12/16/74
		9.2.3.8.10	12/26/74
		9.2.4.8.10	1/3/75
1	1/3/75	9.2.6.1	1/3/75
2	1/3/75	9.2.7.1	1/5/75
3	1/3/75	9.2.6.2	1/3/75
		9.2.7.2	1/6/75
4	1/3/75	9.2.6.3	1/3/75
		9.2.7.3	1/6/75
5	1/3/75	9.2.6.5	1/3/75
		9.2.7.5	Deleted
6	1/3/75	9.2.6.8	Deleted
		9.2.7.8	Deleted
7	1/3/75	9.2.6.9	1/3/75
		9.2.7.9	1/6/75

We believe the above fully responds to your concerns and that there are no open items of noncompliance, and all corrective action has been implemented.

Regarding failure to report the failure of the auxiliary building ventilation duct - 10 CFR 50.55(e) requires the holder of a construction permit for a nuclear power plant to promptly notify the Commission of significant deficiencies found in the design, construction or deviation from performance specifications.

Contrary to the above, the failure of the auxiliary building duct on November 5, 1975, was not reported. The ducts between the ventilation filters and the fans commenced to distort (partial collapse) at a negative pressure between 1.5 and 3.5 inches of water during a preoperational test that was being conducted in accordance with TP 7 2 1712, "Auxiliary Building Vent Supply and Exhaust Functional Test".

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The procedure specified testing with 85% of the filter area blocked to simulate a calculated pressure drop across the filters of six inches of water. Failure to report the failure of the safety related ducts is considered to be a deficiency.

Reply: We wish to offer the following:

On November 15, 1975 during the testing of the auxiliary building ventilation duct under TP 7 2 1712 it was noticed that the side walls of the duct were deforming. The testing of this duct at these simulated pressure readings is to accomplish criteria of dirty filters. This deformation was relayed to Generation Engineering who then contacted Gilbert Associates for recommendations and comments. Within a time span of one day, the problem was solved and we did not consider it to be a significant deficiency for the following reasons:

1. The design re-evaluation involved using the differential pressure across the filter trains converting this pressure reading on the side walls to a force loading. They then verified a member that had an L/R property to adequately support the loading force.
2. After the design review was performed, our construction forces work was minimal to correct this concern. This involved removing the existing stiffener strut and replacing it with a larger strut.
3. All of the rework involved only the internal strut members and did not involve any rework of the external bracing of the duct system. It was verified that the external bracing of the duct system was adequate.
4. Any collapse, if would have continued, would not have released any radioactive material to the surrounding area. The section of duct in question is on the suction side and would only have reduced the volume of exhaust gases from the fuel handling building. Another redundant safety feature is that in the fuel handling building monitoring devices have been installed that will set off alarms if the radioactive level would increase.

It is still, therefore, our opinion that the incident in question does not meet the criteria established by 10 CFR 50.55(e) for notification of the commission as a significant deficiency.

We consider that all of the above constitute the written statement as required by NRC Rules of Practice, Part 2, Title 10, Section 2.201.

Very truly yours,

JTR:ldh

J. T. Rodgers
Assistant Vice President

cc: M. H. Kleinman
J. Alberdi