

**Florida  
Power**  
CORPORATION

28 July 1978  
3-0-3-a-2  
CS-78-163

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:RHW  
50-302/78-16

Dear Mr. O'Reilly:

We offer the following responses to the apparent Items of Noncompliance in the referenced Inspection Report.

NOTICE OF VIOLATION

A. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, which includes procedures for the control of radioactivity. RP-106, Radiation Work Permit Procedure, establishes the licensee's procedures for use of a radiation work permit. Section 5.1.3 of RP-106 requires the Chem/Rad Section to identify specific controls for plant personnel to follow when working under the radiation work permit. RWP No. 78-1045 of June 5, 1978, issued for the investigation of FHCN-4B Restriction and Repair required that "Chem/Rad will provide coverage when the divers are in the pool."

Contrary to the above, the divers were in the Reactor Building pool under the auspices of this RWP at about 6 p.m. on June 10, 1978, without Health/Physics coverage.

A. Response: This event was identified by the licensee and corrective action had been initiated prior to the inspector's review. Discrepancy Report W/DR-193 had been issued and all concerned personnel have been counselled as to the severity and possible consequences of this occurrence. In our opinion, this event should not have been classed as an item of noncompliance as it was identified and corrective action taken internally.

Corrective action to preclude recurrence has been achieved this date.

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- B. Criterion VIII to 10 CFR 50 Appendix B (Identification and Control of Material, Parts, and Components) requires the establishment of measures to prevent the use of incorrect or defective material in safety-related activities. Criterion XIV to 10 CFR 50 Appendix B (Inspection, Test, and Operating Status) requires the establishment of measures, such as tagging or marking to indicate the status of inspection or tests on components, to preclude their inadvertent use. These criteria are implemented, in part, by Section 1.7.6.7 (Operation QA Program) of the FSAR, and by the licensee's Quality Program Policies 8.1 (Identification and Traceability of Items Used During the Operational Phase) and 14.1 (Inspection, Test, and Operating Status).

Contrary to the above, the hook used to lift a 2050 lb. test weight in the spent fuel pool (adjacent to nuclear fuel assemblies) was locally manufactured from non-certified material, was not load tested or qualified prior to use, and was not tagged or marked as to the limitations on its use. The failure of this hook on June 9, 1978 while in use contributed to the damage to fuel assembly A-48.

- B. Response: Surveillance Procedure SP-601 (Procedure for Load Testing of Slings) covers the load testing of slings and chokers, but did not specifically address the load testing of shackles and hooks.

SP-601 has been revised to specify that, in addition to load testing, all shackles and hooks will be tagged as to the load rating, and all special purpose lifting equipment will be tagged to identify the purpose for which it was designed.

As an extra precaution and in addition to the preceding changes, several signs have been placed at strategic locations in the Reactor Building and spent fuel area, directing crane operators to make no lifts over pools or the reactor vessel while they contain fuel, except with a PRC approved procedure.

To ensure that all concerned plant personnel are aware of the additional requirements for identifying, controlling and selecting equipment used in rigging, each first-line supervisor has been directed to formally discuss (and confirm that he had discussed) the new requirements with each of his personnel.

Full compliance has been achieved as of this date.

- C. Criterion XVI to 10 CFR 50 Appendix B (Corrective Action) requires the establishment of measures to assure conditions adverse to quality such as defective material, are promptly identified and corrected. This criterion is implemented, in part, by Section 1.7.6.7 (Operation QA Program) of the FSAR, and by the licensee's Quality Program Procedure 16.50 (Corrective Action for Operations Phase).

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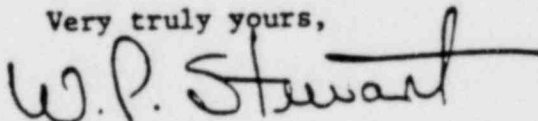
Contrary to the preceding paragraph, action was not taken to preclude the movement on June 11, 1978, of two potentially damaged fuel assemblies (No's A-48 & A-20) until completion of the evaluation and inspection of these assemblies was feasible.

C. Response: A documented Plant Review Committee (PRC) meeting was held on 9 July 1978 with the Nuclear Plant Manager in attendance. It was understood by those present at this meeting that the potentially damaged fuel assemblies would not be moved until a video camera inspection was completed. Both fuel transfer mechanisms were inoperative and the possibility of the potentially damaged fuel assemblies being moved by mistake was neither recognized nor discussed at this meeting. Subsequently, the completed video taped safety evaluation indicated that there was no damage to the upper end fittings of the fuel assemblies. A Short Term Instruction (STI) should have been issued to preclude the movement of the potentially damaged fuel assemblies. In the future STI's will be issued to affect move sheet changes for PRC decisions affecting fuel status.

Full compliance has been achieved as of this date.

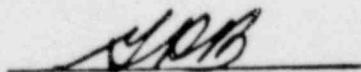
If there are further questions, please contact us.

Very truly yours,



W. P. Stewart  
Director, Power Production

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Nuclear Plant Manager