



**Florida
Power**
CORPORATION

November 1, 1989
3F1188-01

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License DPR-72
Inspection Report 89-20

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the subject inspection report.

Should there be any questions, please contact this office.

Yours very truly,

Rolf C. Widell
Director, Nuclear Operations Site Support

WLR:mag

Att.

xc: Regional Administrator, Region II
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 89-20
REPLY TO NOTICE OF VIOLATION

VIOLATION 89-20-01

Technical Specification 6.8.1 requires the implementation of written procedures for those activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33 includes operation and maintenance procedures.

Contrary to the above:

- 1) On August 28, 1989 MP-150, Maintenance of Raw Water Pump, paragraph 4.2.5 requiring quality control to verify the condition of mating surfaces prior to assembly, was not performed.
- 2) On September 4, 1989 OP-450, Emergency Feedwater System, was not properly implemented in that valve ASV-167 was found not locked in position as required by OP-450.

This is a Severity Level IV Violation (Supplement I).

FLORIDA POWER CORPORATION RESPONSE

Florida Power Corporation (FPC) accepts the violation.

APPARENT CAUSE OF VIOLATION

- 1) Failure to comply with the the procedural requirements of MP-150 is a combination of failure to follow procedure and procedural inadequacy. Step 4.2.5 calls for QC to verify the condition of all machined mating surfaces. Failure to list what mating surfaces were intended by "all machined mating surfaces" did not provide adequate guidance for the craft performing the work activity nor did it provide adequate placement of QC hold points. The Quality Control Inspector advised the maintenance personnel that there were additional inspections to perform prior to reassembly, but this information was not communicated to the next maintenance shift and there were no reminders referring workers back to step 4.2.5 in the procedure.
- 2) The cause of the violation is attributed to personnel error. On several occasions ASV-167 was unlocked and repositioned to adjust bypass steam flow. Following one of the adjustments, the personnel involved failed to re-lock the valve.

CORRECTIVE ACTION

- 1) Reassembly was discontinued until it was determined that no safety impact, due to the missed inspection, was involved. During the performance of the successive rebuild of RWP-2B, each assembly step of a machined flange was marked with an asterisk to remind the individual that a QC Inspector must inspect this surface prior to assembly. Step 4.2.5 was utilized as the final acceptance of all flanges.

The importance of adhering to procedural requirements was stressed to the Mechanical and Building Services Supervisors and the craft personnel.

The maintenance department has begun utilizing a log book to record written turnovers.

- 2) ASV-167 was locked upon notification of the incorrect position.

DATE OF FULL COMPLIANCE

- 1) Full compliance was achieved on August 8, 1989 when it was determined that the missed QC hold point had no safety impact and supervision was assured the flange was cleaned and installed properly.
- 2) ASV-167 was locked upon notification by the NRC inspector on September 4, 1989.

ACTIONS TAKEN TO PREVENT RECURRENCE

- 1) MP-150 will be revised to list machined surfaces to be checked and QC hold points will be placed appropriately. Other mechanical maintenance procedures will be reviewed for similar revisions.
- 2) This incident will be reviewed by all on-shift Operations personnel. In addition, ASV-167 will be labeled to indicate that it should be locked in a throttled position.