



**Florida
Power**
CORPORATION

November 21, 1989
3F1189-17

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 89-23

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 89-23
REPLY TO NOTICE OF VIOLATION

VIOLATION 89-23-01

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for those activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix "A", recommends procedures for equipment control. This includes control of openings from potentially contaminated areas (auxiliary building) to the environment and control of combustible material.

1. FPC Chemistry and Radiation Protection Procedure RSP-110 "Control of Auxiliary Building Rollup Doors" provides control of the large doors in the auxiliary building. Smaller doors are controlled by appropriate warning signs.

Contrary to the above, on September 14, 1989, the manual sliding door leading from the auxiliary building compactor room to the outside environment on elevation 119 feet was found open, unattended and not controlled.

RSP-110 "Control of Auxiliary Building Rollup Doors" is deficient in that control of this sliding door is not addressed.

2. FPC Administration Instruction AI-2200, Guidelines for Handling, Use and Control of Transient Combustibles" describes the policies for handling and control of transient combustible materials, liquids and gases at Crystal River Unit 3.

Contrary to the above, on September 18, 1989, uncontrolled transient combustibles were found in the Auxiliary Building in the Sea Water room. This is a safety related area.

Procedure AI-2200, is deficient for control of transient combustibles in that the violation was found to be recurring during the licensee Quality Programs Audits and also on September 18, 1989 by the Resident Inspector.

This is a Severity Level IV Violation (Supplement 1).

FLORIDA POWER CORPORATION (FPC) RESPONSE

Florida Power Corporation accepts the violation.

APPARENT CAUSE OF VIOLATION

1. The cause of this violation was lack of adequate administrative controls. Although the sliding door was marked to close the door, it was not labeled with an appropriate sign, and it was not reiterated through procedural controls to keep the door closed when not in use.
2. The current procedure places responsibility for controlling combustibles solely on the Nuclear Fire Protection staff. One department is not adequate to implement an entire program that involves various departments. The procedure is deficient by not placing the control of combustibles used within the plant on the individual supervisors and workers using the transient combustibles.

CORRECTIVE ACTION

1. An individual was immediately posted at the sliding door to ensure it was shut after use until more permanent corrective actions were in place. In conjunction with this, hourly roving fire watches and roving security officers were instructed to ensure this door was shut when not in use.

Two signs were placed on and above the sliding door. Both signs state the need to close the door after use. The sign above the door is reinforced to draw attention by red flashing lights. In addition, a switch which activates a beeper when the door is open was also installed to further enhance personnel awareness to close the door after use.

2. AI-2200 is being revised to place the responsibility for controlling transient combustibles on the individual work supervisor.

As an interim measure, the Fire Protection staff addressed a recent meeting of first line supervisors concerning the recurring deficiencies in transient combustible control. The new requirements of AI-2200, that individual workers and supervisors assume responsibility for controlling combustibles during their use and presence in the workplace, was reviewed and clarified.

DATE OF FULL COMPLIANCE

1. Full compliance was achieved on September 14 when the individual was posted to assure closure of the door. The signs and red flashing lights were completed on September 18, 1989.
2. Full compliance will be achieved no later than December 29, 1989 upon implementation of AI-2200.

ACTIONS TAKEN TO PREVENT RECURRENCE

1. RSP-110 will be revised to require closure of the sliding door in the Green room when not in use.
2. The above corrective actions will be sufficient to prevent recurrence.