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Florida Power

December 18, 1980 3-0-3-a-2 CS-80-290 3-120-31

Mr. J. P. O'Reilly, Director Office of Inspection & Enforcement U.S. Nuclear Regulatory Commission Atlanta, GA 30303 Docket No. 50-302 Licensee No. DPR-72 Ref: 80-33/RII:TFS 50/302/80-33

Dear Mr. O'Reilly:

We offer the following responses to the Items of Noncompliance in the referenced report.

NOTICE OF VIOLATION

- A. Based on the NRC inspection September 2 October 3, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below:
 - a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant staff management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
 - c. The change is documented, reviewed by the PRC and approved by the Nuclear Plant Manager within 14 days of implementation.

Contrary to the above, on April 12, 1980, a temporary change was made to Surveillance Procedure SP-161, Remote Shutdown Instrument Calibration, without the approval of two members of the plant management staff and was not reviewed by the PRC and approved by the Nuclear Plant Manager within 14 days of in ementation.

A. Response: As a result of this event, appropriate plant procedures have been reviewed with the cognizant supervisers to assure their understanding of the consequences of noncompliance with procedures.

A modification (80-9-76) has been initiated to install 0-3000 psig pressure gauges in place of the 0-2000 psig gauges. In addition, a revision will be submitted to Surveillance Procedure SP-161, Remote Shutdown Instrumentation Calibration to change the appropriate

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pressure indicator calibration sheets to conform to the higher range gauges.

Full compliance will be achieved upon procurement of the gauges which is anticipated prior to 1 May 1981.

Should you have any further questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION

Nuclear Plant Manager

J. A. Hancock

Assistant Vice President Nuclear Operations

KFL/rc