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AUG 18 1983

Florida Power Corporation
ATTN: Mr. W. S. Wilgus
Vice President Nuclear Operations
P. O. Box 14042, M.A.C. H-2
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: INSPECTION REPORT NO. 50-302/82-29

This refers to your letter dated March 11, 1983, in response to a Notice of Violation sent to you by our letter dated February 11, 1983. In our letter of April 13, 1983, we acknowledged receipt of your response and informed you that we are evaluating the response for acceptability. We have evaluated your response and do not agree with you that the issuance of these violations is inappropriate.

With regard to Violation A, we do not agree that this violation be classified as licensee identified and that a citation is not appropriate. As stated in the details of NRC Report 82-29, the deficiency was first identified by your own Quality Programs audit on April 9, 1982. On April 15, 1982, your technical staff issued and the Plant Review Committee (PRC) approved a change to procedure SP-355 which added Technical Specification (TS) 4.3.2.1.1(5.a) and (5.d) to section 1.2. This change demonstrated that the staff and the PRC had performed a review and had presumed that these TS requirements were being accomplished while in fact they had not been accomplished. When, on October 6, the TERA Corporation made a similar finding that TS requirements 4.3.2.1.1(5.a) and (5.d) were not covered by SP-355, the staff responded that these requirements were addressed by procedure sections 1.1 and 1.2.

It appears that the staff had sufficient notification that a deficiency existed and that the staff did not perform an adequate technical review when the procedure change was made on April 15.

Your response that the corrective actions for the previous two violations (Reports 81-19 and 81-23) could not have prevented this deficiency is not correct. These reports identified inadequate testing of TS mandated surveillance requirements. Your failure to identify the root cause of these violations (i.e., an inadequate review of all TS surveillance requirements) has resulted in this violation. We believe that to prevent further violations of this type an ambitious review of the technical adequacy of all your surveillance procedures as they relate to TS surveillance requirements will have to be undertaken.

We, therefore, conclude the issuance of a citation for Violation A is appropriate since enforcement policy does not permit credit for self identified noncompliances when the corrective action is inadequate to prevent recurrence.

With regard to Violation B, we do not concur with your response to this violation. You stated that the Operations Section Implementation Manual (OSIM) does not require logging of "repeat routine items which have no safety significance or

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little operational importance." While we do not disagree with the intent of this statement, we cannot agree that entry into a Technical Specification (TS) action statement is a "routine" event that has "no safety significance." Entry into TS action statements are significant safety events which must be logged to insure that members of that shift and subsequent shifts are aware of plant status.

You further stated "that the Shift Supervisors Log is a redundant log to other operational logs" and that the Equipment Out-of-Service (EOS) Log indicated that the equipment required by Specification 3.1.2.1 was out-of-service." While the (EOS) log did indicate that both BAST's were out of service, the log did not indicate that valves DHV-34 and DHV-35 were isolated nor that the BWST was out of service, therefore this log, by itself, would not have alerted operators to the fact that they were in an Action Statement.

We do not agree with your position that the OSIM is not subject to audit. Regulatory Guide 1.33 requires an administrative procedure that delineates log entry practice. Your procedure AI-500 makes the following statement regarding log entries: "Two logs are to be kept: the Shift Supervisors' Log, a narrative log of significant plant events; and the Operators' log, a chronological account of plant manipulations." This statement, by itself, provides insufficient direction for making log entries. Your procedure then goes on to say "Each shift will comply with log entry and review practices detailed in the OSIM." Since the OSIM becomes the document that provides the necessary direction for making log entries, it is considered to be an auditable and enforceable document under the regulations.

Your letter of February 10, 1983 does not provide the information required by 10 CFR 2.201. Accordingly, please submit a written response to this office within 20 days of your receipt of this letter which provides the information required by 10 CFR 2.201.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

James P. O'Reilly
Regional Administrator

cc:
G. R. Westafer, Manager
Nuclear Licensing and
Fuel Management
E. M. Howard, Director,
Site Nuclear Operations

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