

**Florida  
Power**  
CORPORATION

SEP 22 10:00  
ATLANTA, GA

September 16, 1981  
#3-091-09  
CS-81-109  
File: 3-0-3-a-2

Mr. J. P. O'Reilly, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, Ste. 3100  
Atlanta, GA 30303

Subject: Docket No. 50-302  
License No. DPR-72

Ref: R11: TFS  
50-302/81-13

Dear Mr. O'Reilly:

We offer the following response to the violations listed in the referenced inspection report.

Notice of Violation

Technical Specification 6.8.1 requires that procedures covering applicable activities recommended in Appendix "A" of Regulatory Guide 1.33 be implemented and followed.

Regulatory Guide 1.33, November 1972, Section I.3.g requires written procedures for the replacement of neutron detectors, and Section I.5 requires written general procedures for the control of maintenance work.

Maintenance Procedure (MP)-201, Out-Of-Core Detector Removal and Replacement, Revision 5, dated 4/23/81, Section 8, step 8.0.1 states that "the man in charge of performing this activity shall initial the Check-Off List... after each step identified by an "X" is performed."

Compliance Procedure (CP)-113, Procedure for the Handling and Controlling Work Requests, step 5.3.6, requires the shift supervisor to initial work requests in the "Post Maintenance Test" block after the work "Accept:" indicating that adequate post maintenance testing of nuclear safety-related equipment has been performed to confirm operability.

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Contrary to the above,

- (1) During the period of July 2, 1981, through July 7, 1981, at 1030 hours, no procedural steps identified by an "X" in MP-201 had been initialed during the replacement of eight neutron detectors; and
- (2) A review of eleven safety-related work requests completed during the period March 1, 1981, through July 7, 1981, requiring post maintenance testing, revealed that ten of the eleven work requests did not contain the required shift supervisor's initials.

Response: Florida Power Corporation concurs with the stated violation. The cause of this violation is attributed to a lack of training of individuals responsible for procedure compliance, and communication problems concerning procedure changes. All individuals on the plant staff responsible for procedure compliance have had special training sessions given by the Nuclear QA/QC Compliance Department, concerning this violation. This training consisted of approximately three (3) hours of classroom time reviewing the controlling procedures not normally reviewed on a recurring basis by staff personnel.

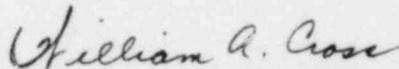
In the future, procedure change information will be better distributed to all concerned personnel, and supervisory personnel are now required to review all changes to controlling procedures with their staff.

Full compliance has been achieved as of this date.

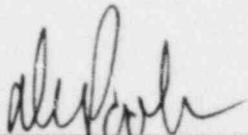
Should there be any further questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION



William A. Cross  
Manager  
Nuclear Licensing

  
Nuclear Plant Manager

STATE OF FLORIDA

COUNTY OF PINELLAS

William A. Cross states that he is the Manager, Nuclear Licensing, Nuclear Support Services, of Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

William A. Cross  
William A. Cross

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 16<sup>th</sup> day of September 1981.

Margaret A. Chisamore  
Notary Public

Notary Public, State of Florida at Large,

My Commission Expires: May 29, 1984