

SEP 24 1981

APPENDIX A

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River 3

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

As a result of the inspection conducted on July 21 - August 25, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. 10 CFR Part 50, Appendix B, Criterion V, requires activities to be accomplished in accordance with appropriate instructions, procedures, or drawings.

The licensee's Quality Program, as delineated in FSAR Section 1.7.6.7.1.E contains requirements and procedures to assure that the 18 criteria specified in 10 CFR 50, Appendix B are accomplished in accordance with procedures. In addition this section requires strict adherence to these procedures.

The following represent failures to implement appropriate instructions and procedures as required by Criterion V.

1. The instructions contained in Modification Approval Record (MAR) 78-1-1 implemented in September, 1978 and in MAR 78-1-1A implemented in March, 1979, required relocation of the emergency feedwater pump turbine bearing oil sightglasses. The modifications required changes to the sightglass piping and adjustment of the sightglass level per attached sketches so that normal level was indicated in the center of the sightglasses. In addition MAR 78-1-1A required the scribing and labeling of low oil level lines on the turbine casing and removal of all high/low level marks from the sightglasses.

Contrary to the above, as of August 13, 1981, the sightglass levels were not adjusted as specified in MARs 78-1-1 and 78-1-1A. Also contrary to the above, the turbine casing was not scribed and labeled with lines indicating low oil level nor were the high/low level marks removed from the sightglasses.

2. The instructions contained in Modification Approval Record (MAR) 80-5-78C, implemented in August, 1980 required functional testing of the main steam line radiation monitors.

Contrary to the above, as of August 24, 1981, the test procedure was not completed as specified in the MAR.

3. Procedure CP-114, Procedure for Preparation of Permanent and Temporary Modifications, specifies in paragraph 7.1 that minor changes to modifications are accomplished by a Field Change Notice (FCN).

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Contrary to the above, as of August 24, 1981, a minor change was made to MAR 80-5-78C in that the data sheet to the test procedure was changed and no FCN was issued.

4. The instructions contained in Modification Approval Record (MAR) 80-02-72B required pipe support EFH-64 to be modified in accordance with Gilbert Associates Inc., drawing 32064. This drawing required the installation of a 12" square base plate perpendicular with the pipe run and a 12" x 19" base plate in-line with the pipe. Drawing 30264 required bolt spacing of 8" for base plate "D" and the installation of grout under the base plates.

Contrary to the above, as of February 27, 1981, installation records for pipe support EFH-64 showed that base plates were reversed. The records also showed that minimum bolt spacing was 7 3/8" for base plate "D" and that the base plates were grouted without a documented procedure for grouting. In addition, no record of an engineering evaluation and acceptance of these conditions was available.

This is a Severity Level V Violation (Supplement 1.D.).

- B. 10 CFR 50.59 states that the holder of a license authorizing operation of a production or utilization facility may make changes in the facility as described in the Safety Analysis Report without prior commission approval unless the proposed change involves an unreviewed safety question. FSAR Figure 4-5 shows seven auxiliary feedwater inlet lines to each steam generator. FSAR paragraph 10.2.1.2 describes the emergency feedwater system including emergency feedwater head requirements. FSAR paragraph 10.2.1.2 also indicates that emergency feedwater piping is designed to seismic category 1.

Contrary to the above, as of February 1981, Modification Approval Records (MARs) -79-5-62 and 79-5-62A authorized modification of the Emergency Feedwater (Auxiliary Feedwater) system and plugging of one inlet line per steam generator, without commission approval, by performing a safety evaluation that consisted of verbal Babcock and Wilcox advice that sufficient emergency feedwater would be delivered after the modification. No analysis was performed by the licensee. In addition, the effect of the modification on the seismic analysis had not been determined. The modification was completed on July 15, 1980.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good

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cause shown. Under the authority of Section 162 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Date: SEP 24 1981