

FEB 10 1994

Docket No. 50-302
License No. DPR-72
EA 93-301

Florida Power Corporation
Mr. P. M. Beard, Jr. (NA2I)
Sr. VP, Nuclear Operations
ATTN: Mgr., Nuclear Licensing
15760 West Power Line Street
Crystal River, FL 34428-6708

Gentlemen:

SUBJECT: NOTICE OF VIOLATION
(NRC INSPECTION REPORT NO. 50-302/93-16)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by George T. Hopper of this office during the period November 15-19 and December 6-10, 1993. The inspection included a review of activities authorized for your Crystal River 3 facility in the area of your Emergency Operating Procedures (EOP). The report documenting this inspection was sent to you by letter dated December 30, 1993. As a result of this inspection, violations of NRC requirements were identified. An enforcement conference was held on January 18, 1994, in the NRC Region II office, Atlanta, Georgia, to discuss the violations, their cause, and your corrective actions to preclude recurrence. A list of attendees at the enforcement conference and a copy of your enforcement conference brief are enclosed.

It appears that a lack of effective management control and oversight of the EOP program was the major factor contributing to the violations as evidenced by the inattention to program requirements during the development of the EOPs and the limited application of resources to the EOP program. Additionally, quality assurance activities failed to identify the significant programmatic problems.

In light of the information available to the Florida Power Corporation, the NRC is concerned that significant process and technical problems with the EOP program existed at the Crystal River Facility at the time of the inspection. The failures of the Florida Power Corporation were in three critical areas. First, the individual assigned the responsibility to develop the EOPs was not knowledgeable of the components necessary to ensure a quality product. Second, line management did not provide effective oversight of the EOP process. This is particularly disturbing because the conclusions of NUREG-1358 (April 1989) stated that the majority of the problems with EOPs at other nuclear power plants were due to the lack of adequate implementation of the published guidance. This was again identified as the root cause of widespread EOP programmatic weaknesses in NUREG 1358 Supplement 1 (Oct. 1992). And finally, the quality assurance organization was ineffective in providing senior management with assurance that the EOP process was being properly implemented.

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You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to take to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

(Original signed by A. F. Gibson)

Albert F. Gibson, Director
Division of Reactor Safety

Enclosures:

1. Notice of Violation
2. Enforcement Conference
Attendee List
3. FPC Enforcement Conference Brief

cc w/encls:

Gary L. Boldt
Vice President, Nuclear Production
Florida Power Corporation
15760 West Power Line Street
Crystal River, FL 34428-6708

B. J. Hickle, Director
Nuclear Plant Operations
Florida Power Corporation
15760 West Power Line Street
Crystal River, FL 34428-6708

cc w/encls: (See page 3)

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cc w/encls:

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bcc w/encl: (See page 4)

bcc w/encl
 K. Landis, DRP
 H. Silver, NRR
 J. Lieberman, OE
 B. Uryc, EICS
 J. Jaudon, DRS
 G. Hallstrom, DRS
 Document Control Desk

NRC Resident inspector
 U.S. Nuclear Regulatory Commission
 6745 N. Tallahassee Road
 Crystal River, FL 34428

****FOR PREVIOUS CONCURRENCE SEE ATTACHED COPY**

RII:DRS **	RII:DRS **	RII:DRS **	RII:DRS **	RII:DRP **	RII:DRP **
JBartley:jhb/fr 01/ /93	GHopper 01/ /93 94	LLawyer 01/ /93 94	TPeebles 01/ /93 94	KLandis 01/ /93 94	MSinkule 01/ /93 02 / 94

RII:DRP EMerschoff 02/8/93 94	RII:EICS BUryc 01/09/93 02 94	RII:ORA CEvans 01/10/93 02 94	RII:DRS AGibson 01/10/93
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bcc w/encl:
K. Landis, DRP
H. Silver, NRR
J. Jaudon, DRS
G. Hallstrom, DRS
Document Control Desk

NRC Resident Inspector
U.S. Nuclear Regulatory Commission
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Crystal River, FL 34428

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RII:DRP	RII:EICS	RII:ORA	RII:DRS
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