



Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

February 16, 1994
3F0294-11

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: NRC Inspection Report 93-29
NRC to FPC letter, 3N1293-43, dated December 23, 1993

Dear Sir:

This correspondence is provided in response to the concern expressed in the subject cover letter. In that letter you stated in part:

"We are concerned about the multiple examples of failure to follow procedures. We consider these possible precursors to more safety significant procedural problems in the radiological controls area as well as potentially other plant disciplines."

Florida Power Corporation (FPC) does not agree with this characterization of the examples cited in the Inspection Report. FPC has made significant improvements to our Problem Report (PR) System over the last two years. As part of that improvement, FPC has made a concerted effort to identify problems at a lower threshold and to assure they are reported through the PR System. These actions allow us to track, group and trend problems so that precursors to more significant problems can be more readily identified. As noted in the Inspection Report, all of the cited examples were identified in our PR System and included for tracking and trending. In addition, three of the instances cited had been addressed in an FPC Quality Programs evaluation with no common cause revealed. Thus, considering the information in your report and the other data in our PR System, it is our judgment that there is no basis for concluding that these examples are precursors in the radiological controls area or any other plant discipline.

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The progress we have made in our ability to identify problems at a lower threshold, to correct the specific problem and to utilize the data for identifying adverse trends is essential to maintaining and improving the overall performance of Crystal River Unit 3. When an NRC inspection report includes a statement, as noted above, that (in our view) is an incorrect characterization of the situation, it can undermine the effectiveness of our Problem Report System (i.e., employees will be less candid in identifying problems at a lower threshold).

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB/RLM:ff

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector