Florida Power
CORPORATION

November 15, 1982
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Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 3100
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report 82-11
Supplemental Response

Dear Mr. O'Reilly:

By letter dated November 2, 1982, Florida Power Corporation committed to supplying, on or before November 15, 1982, a detailed discussion of the plan by which existing drawings will be reviewed and upgraded, a schedule for this review and upgrade, and a discussion of the plan to upgrade the program of modification-in-progress drawing control. The attached information is hereby submitted in accordance with this commitment.

Very truly yours,

Patsy Y. Baynard

Dr. Patsy Y. Baynard
Assistant to Vice President
Nuclear Operations

Attachment

DVH:mm

SUPPLEMENT TO I.E. INSPECTION REPORT 82-11

The action plan discussed herein covers both procedural or process improvements and the actual updating and field verification of the Crystal River Unit 3 (CR#3) Flow Diagrams. Florida Power Corporation (FPC) has initiated actions toward improving the drawing control process. A plant procedure titled "Procedure for Preparation and Handling of Field Problem Reports" (CP-126) has been issued to provide a formal plant review channel for plant problems and initiation of an engineering request for information (REI) to Nuclear Engineering. Additional Nuclear Operations and Nuclear Engineering procedures which provide the total project control after the REI request, including drawing control, have been developed. Specifically, these procedures include Nuclear Controls procedures N.C.-05 through N.C.-11, which have been issued, and Nuclear Engineering procedure N.E. 01 titled "Nuclear Engineering Request for Engineering Information" which is in the final review stage for issuance. These procedures are intended to provide better project control by insuring the proposed modification is planned and scheduled over the entire project process, including the "as-built" stage and project closure. In the past, modifications were monitored and controlled up to installation, but the final drawing update and closure of the project was not tracked effectively.

This new Project Management approach identified in the above procedures is aimed at: 1) assuring single point accountability throughout the entire modification process, including the drawing update process; 2) assuring visibility of deviations to management; and 3) providing timely project completion.

In addition to these new procedural and program improvements, Nuclear Engineering is now attempting to prepare modification packages in several smaller work packages which can be individually tracked and closed (as-built) sooner than one large modification package.

In a parallel effort, FPC has been developing an action plan to update the existing CR #3 Flow Diagrams and verify their accuracy by field walkdowns. Consistent with this plan, Nuclear Engineering developed a bid specification for placing the CR #3 Flow Diagrams on a Computerized Drafting System (CAD). Proposals for this effort have been received, reviewed, and a contract is being processed to begin this effort. The "ACTION PLAN" on the following page contains our plan and schedule for updating and field verifying the CR#3 Flow Diagrams. Once this effort is completed, it is our intent to be able to issue updated Flow Diagrams at the completion of each modification and thereby eliminate the present lag time between completion and "as-built" drawing issuance.

FPC will continue to evaluate the modification and drawing control process and make improvements, as necessary, to enhance the program. We believe the above program improvements are responsive to the identified concerns and will significantly enhance our drawing control process.

ACTION PLAN

	ITEM	SCHEDULED COMPLETION DATE
1.	Re-draw existing Flow Diagrams on Computerized Drafting System (CAD).	3/1/83
2.	Review installed modification packages at CR#3 not yet as-built and determine changes needed to Flow Diagrams.	2/1/83
3.	Incorporate changes on Flow Diagrams for modifications presently installed and issue Flow Diagrams.	3/1/83
4.	Walkdown Flow Diagrams in the field for verification of as-built conditions and update the Flow Diagrams accordingly.	6/1/83
5.	Incorporate changes to Flow Diagrams into the CAD system for those CWP's being installed during Refuel IV.	7/1/83
6.	Issue Flow Diagrams once modifications are complete that are current through Refuel IV.	8/1/83