



USNRC REGION II
ATLANTA, GEORGIA

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**Florida
Power**
CORPORATION

September 24, 1982
#3F-0982-19
File: 3-0-3-a-2

Mr. J. P. O'Reilly
Regional Administrator, Region II
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 Number 82-11

Dear Mr. O'Reilly:

Florida Power Corporation hereby responds to the violations cited in I.E. Inspection Report Number 82-11 as transmitted by letter dated August 20, 1982, Lewis to Hancock. Please note that clarification of the violation was required. Therefore, a one week extension of the required response date was agreed to by your staff.

VIOLATION

- A. Technical Specification 6.8.1 requires procedures for the activities recommended in Appendix A of Regulatory Guide 1.33, 1972. This Technical Specification also requires that these procedures be maintained current.

Regulatory Guide 1.33, Section C requires procedures that provide instructions for filling, venting, and draining of the listed plant systems. Section I.5 requires procedures for the control of modifications. Procedure CP-114, Procedure for Preparation of Permanent and Temporary Modifications, Revision 34, paragraph 6.2 requires that prior to the expiration date of a temporary modification, that the temporary modification be removed or the expiration date be extended.

Contrary to the above, during the period of June 9 through July 19, 1982, the following items were identified:

1. The procedures used to control operations for the Emergency Feedwater System and the Emergency Diesel Generator System do not contain instructions for filling, venting, and draining.

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2. Procedures were not maintained current in that six of the 11 procedures reviewed were found to have Valve Check Lists with missing valves. In addition, some system valves were positioned differently than shown on the check list with no supporting documentation to explain the difference.
3. On July 19, 1982, an audit of 15 temporary modifications identified that 7 of the modifications had exceeded their expiration date and were not removed or the date extended.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

Florida Power Corporation admits the violation in that procedures existed which were incomplete or inadequate, and that control over temporary modifications was apparently ineffective. The reasons for the identified violations are addressed, by item, below.

1. Procedures for control of operations for filling, venting, and draining of the Emergency Feedwater System did exist; however, they were not provided to the inspector during his inspection. This procedure was deficient in filling, venting and draining of the Emergency Feedwater System.
2. Most of the incomplete valve checklists and lineup errors referenced were discovered in the Fire Protection System. This system is not routinely removed from or placed in service. Therefore, these procedures are rarely referenced to perform valve lineups. This lack of use combined with inadequate procedural control allowed these procedures to become out-of-date.
3. The system for administratively assuring that temporary modifications are dispositioned in a timely manner requires enhancement.

The corrective actions taken on the identified violations are addressed, by item, below.

1. No corrective action is necessary for procedures for control of filling, venting, and draining the Emergency Feedwater System, since procedures already exist.

Changes to address the Diesel Generator System test procedure inadequacies have been initiated.

2. Necessary procedure changes have been initiated to correct the cited deficiencies.
3. All temporary modification cited have been removed or the expiration date has been extended, as appropriate, except those which would require an outage to verify their status.

The following actions will be taken to prevent recurrence and are addressed, by item, below.

1. and 2. Personnel involved in routine periodic review have been instructed to give greater attention to assure that valve line-ups, are indeed correct. Furthermore, the results of the reviews initiated as part of the drawing control problem identified below will provide valuable input to correcting any related deficiencies.
3. The reorganization of the CR3 staff to establish a separate group whose major responsibilities are modifications and outage planning is being implemented on a high priority basis. This, coupled with revised administrative controls, is expected to significantly reduce the likelihood of recurrence.

Necessary procedure revisions will be completed by November 9, 1982. Nuclear Operations and Quality Programs management, as part of an ongoing effort, are committed toward an overall program for assuring procedural accuracy, adequacy and effectiveness.

VIOLATION

- B. 10 CFR 50, Appendix B, Criterion V requires adequate drawings and Criterion VI requires these drawings to be controlled.

FSAR Section 1.7.6.7.1 of the Florida Power Corporation Operation QA Program requires, in paragraph e, that drawings be adequate for the task and, in paragraph f, that drawing control be maintained to assure that changes are promptly and adequately included on the drawings.

Contrary to the above, during the period of June 9 through July 12, 1982, the following items were identified:

1. Five of the 11 Flow System Diagrams reviewed were found to be inadequate in that valves were missing, valves were incorrectly diagrammed and actual piping configurations (as built) are different than that shown on the diagrams.
2. Drawing control was not maintained in that system modifications-in-progress drawing notations were not removed when the modification was completed or added when the modification was in progress. In addition, some drawing modifications notations were incorrect in that the modification listed did not apply to the diagrammed system.

This is a Severity Level IV Violation (Supplement I.).

RESPONSE

Florida Power Corporation admits that the items identified, as clarified during discussions with OIE Staff, were violations of 10 CFR 50, Appendix B and our "Operational QA Program". The cause, corrective action, action to prevent recurrence and date of full compliance are provided in response to each of the areas identified.

1. Florida Power Corporation has not been able to specifically identify the cause of each of the inadequacies identified in the report and its subsequent clarification. We acknowledge apparent errors do exist in several of the flow diagrams. We plan to perform a more detailed review of the flow diagrams identifying deficiencies and categorizing their safety significance, cause, and appropriate corrective actions. Errors posing significant safety concerns, if any, will be addressed in a timely manner. Errors of an "editorial or housekeeping" nature will be addressed as part of a longer term program to upgrade the drawings (see response to Item B.2). We will provide a detailed discussion of the plan by which we will accomplish this and its schedule by October 31, 1982.
2. Florida Power Corporation admits that our program for properly handling modification-in-progress drawing control is deficient. This has been identified by your staff, our staff, our QA program and various internal audits. The cause for this varies from personnel error to time delays in the as-building following construction process. In short, our program as a whole, is not accomplishing its intended purpose adequately. We contracted with an outside consultant to review this program several months ago. The recommendations of this review were forwarded to our Engineering department on August 17, 1982. Detailed review of this program is underway and will be presented to management in mid-October. After concurrence from management has been gained, including scope, schedules, manpower/resource commitments, etc., we will proceed with this program. A discussion of this plan will be provided to your office by October 31, 1982. In the interim, we have retrained our engineering staff, by classroom instruction in July and by memorandum in September, to provide more complete understanding of their responsibilities to assure adequate modification-in-progress document control. Depending on the schedule for completing the long-term program, we will consider additional interim actions along with that used to resolve Item B.1. Any further interim actions will be included in our October 31, 1982, response.

Very truly yours,



Patsy Y. Baynard
Assistant to the Vice President
Nuclear Operations