

APPENDIX A
NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

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

As a result of the inspection conducted on May 26 - July 26, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

- 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.
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).

- 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.).

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 cause shown.

Date: AUG 20 1982