



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report No. 50-302/82-11

Licensee: Florida Power Corporation
3201 34th Street, South
St. Petersburg, Florida 33733

Facility Name: Crystal River Unit 3 Nuclear Generating Plant

Docket No: 50-302

License No. DPR-72

Inspection at near Crystal River, Florida

| | | |
|--------------|---|----------------|
| Inspectors: | <u>Vergil H. Brownlee for</u> | <u>8/19/82</u> |
| | T. F. Stetka, Senior Resident Inspector | Date Signed |
| | <u>Vergil H. Brownlee for</u> | <u>8/19/82</u> |
| | B. W. Smith, Resident Inspector | Date Signed |
| Approved by: | <u>Vergil H. Brownlee</u> | <u>8/19/82</u> |
| | V. L. Brownlee, Chief, Division of Project Resident Programs | Date Signed |

SUMMARY

Inspection on May 26, through July 26, 1982

Areas Inspected

This routine inspection involved 319 inspector-hours on site by two resident inspectors in the areas of plant operations, security, radiological controls, Licensee Event Reports, (LER's) and Nonconforming Operations Reports (NCOR's), Reactor Trips, New Fuel Receipt, licensee action on IE Bulletin 79-15, licensee action on previous inspection items, and plant operating procedure review. Numerous facility tours were conducted and facility operations observed. Some of these tours and observations were conducted on back shifts.

Results

Two violations were identified (Failure to adhere to temporary modification requirements of CP-114, to have procedures for system draining, filling, and venting, and to maintain procedures, paragraphs 9 and 12.B (1); and Failure to maintain and control drawings, paragraph 12.B(2)).

DETAILS

1. Persons Contacted

Licensee Employees

- *G. Boldt, Technical Services Superintendent
- J. Brandely, Security and Special Projects Superintendent
- C. Brown, Nuclear Compliance Supervisor
- *D. Brock, Maintenance Specialist
- J. Buckner, Officer of the Guard
- *J. Colby, Assistant Manager, Nuclear Engineering
- *J. Cooper, QA/QC Compliance Manager
- M. Culver, Reactor Specialist
- *Q. Dubois, Assistant Nuclear Plant Manager
- *E. Howard, Director, Site Nuclear Operations
- S. Johnson, Nuclear Technical Support Engineer
- W. Johnson, Operations Engineer
- T. Lutkehaus, Nuclear Plant Manager
- *D. Mardis, Acting Manager, Nuclear Licensing
- *S. Mansfield, Compliance Auditor
- *P. McKee, Operations Superintendent
- *G. Perkins, Plant Health Physicist
- G. Ruzala, Chemistry/Radiation Protection Manager
- D. Smith, Technical Services Superintendent
- *J. Lander, Maintenance Superintendent
- *K. Lancaster, Senior Quality Auditor
- G. Williams, QA/QC Supervisor
- *K. Wilson, Licensing Specialist

Other personnel contacted included office, operations, engineering, maintenance, chem/rad, and corporate personnel.

*Present at exit interview

2. Exit Interview

The inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on July 26, 1982. During this meeting, the inspectors summarized the scope and findings of the inspection as they are detailed in this report. During this meeting, the violations, unresolved item, and inspector followup items were discussed.

3. Licensee Action on Previous Inspection Findings

(Closed) Inspector Followup Item (302/81-01-16): The licensee has designed several modifications to improve the reliability of the Reactor Coolant (RC) and Miscellaneous Waste (MW) Evaporators. The modifications will be completed in the near future. In addition, the licensee has changed the

method of waste processing from the evaporators to portable demineralizers. This has considerably reduced the use of the evaporators, thus minimizing problems with these units.

(Closed) Inspector Followup Item (302/81-01-12): The licensee's engineering evaluation indicates that the sample pump vanes are subject to failure and that periodic replacement of the vanes is the best way to prevent pump seizing. A preventative maintenance program has been implemented that replace the vanes of all continuously operating sample pumps on a 180 day frequency. This action appears to be effective.

(Closed) Inspector Followup Item (302/80-28-07): The licensee has made considerable progress to reduce the amount of continuously lighted annunciators. The application of the "Equipment Out-of-Service Log", "Out-of-Service" stickers, and timely maintenance to repair failed annunciators has been effective.

(Closed) Inspector Followup Item (302/82-10-05): A memorandum outlining the contaminated cart event of May 3 was issued to plant managers and superintendents reminding these personnel of the importance of radiological safety and adherence to procedures.

(Closed) Inspector Followup Item (302/82-05-08): Additional fuel oil samples taken on April 15, 1982 indicate compatible analysis results between the onsite and offsite samples.

(Closed) Inspector Followup Item (302/82-05-17): The licensee has changed the plant process computer software alarm point for DNBR from the Technical Specification limit of 1.30 to 2.00 on March 31. This will insure that the computer alarm will occur prior to the plant exceeding the DNBR limit.

(Closed) Inspector Followup Item (302/82-05-13): Procedure CP-129, Software change Implementation for the Plant Process Computer, was issued on July 8, 1982. This new procedure provides the steps necessary to incorporate and document software changes to the plant process computer.

(Closed) Inspector Followup Item (302/81-07-13): The licensee has verified that the ICS logic diagrams are being kept up to date in the document control department and are available upon request from the training department. The training department has discontinued the practice of obtaining the logic diagram from B&W and will utilize the up to date copies available in document control. The inspector interviewed a training instructor to verify the above information. The inspector has no further questions on this item.

(Closed) Unresolved Item (302/81-01-01): The jumper log is no longer in existence. The licensee has either removed jumpers that are no longer required or placed them under their MAR system. Future jumpers will be installed under the MAR system or covered in CP-113, Procedure for Handling Work Requests, under the "Equipment Alteration Log" data sheet.

(Closed) Inspector Followup Item (302/81-01-08): The Safety Listing Book is now being kept up to date with the issuance of numerous revisions. The inspector has no further questions on this item.

(Closed) Inspector Followup Item (302/81-02-05): The inspectors have observed operators performing valve lineups independently. The practice of two men independently performing lineups at the same time has been stopped. The inspectors have no further questions on this item.

(Closed) Inspector Followup Item (302/81-02-18): The licensee has revised the Operations Section Implementation Manual (OSIM) to include guidance to the operations section for performing valve lineups on valves tagged to other departments.

(Open) Unresolved Item (302/82-09-01): The licensee has revised procedure AI-100, Facility Administrative Policies, to clearly outline how either formal or informal proposed Technical Specification (TS) changes will be controlled. Discussions with licensee site personnel indicate that this revision will be effective. The inspector's discussions with licensee corporate personnel (Nuclear Operations) indicate that a similar procedure revision of the Nuclear Operations procedure manual is necessary to insure that these personnel are also provided direction for handling proposed TS changes since the activities of these personnel are not directed by the facility's AI procedures. This item remains open pending a revision of the nuclear operations procedures and implementation of these new directives.

(Closed) Unresolved Item (302/81-02-08): CP-124, Nonconforming Item Tag Control, was issued on October 12, 1981. This procedure requires that equipment tagged with Nonconforming Item tags (NCI) are not to be relied upon to perform a safety function. The inspectors have observed the use of NCI tags to verify the implementation of the procedure requirements. The inspectors have no further questions on this item at this time.

(Closed) Inspector Followup Item (302/81-02-14): The affected containment isolation valves have been identified, lubricated and are now part of a formal lubrication program in PM-133, Equipment Lubrication Procedure. The inspectors have no further questions on this item.

(Open) Inspector Followup Item (302/81-05-03): Additional testing is to be performed on hydraulic snubbers to determine the reasons for air introduction into the snubber fluid. Based on the results of this testing the reportability of this problem as a generic problem under 10 CFR 21 will be evaluated. This item will remain open pending test results.

(Open) Inspector Followup Item (302/82-05-09): The licensee has written and implemented a modification (MAR 82-06-03) and is conducting a test (PT-701) to measure the vibrations around the make-up pumps. The test is expected to be run on July 28. The results of this test will then be reviewed by the licensee's engineering group and consultants and a modification developed to prevent weld cracking.

(Closed) Unresolved Item (302/82-02-06): Interviews with operating personnel and observation of in-plant activities indicates that the work status system used by the Nuclear Shift Supervisor is effective. Action on this item is complete.

(Closed) Violation (302/82-09-04): Memoranda were issued on July 12 for on-site personnel and on July 26 for corporate personnel that provide a synopsis of the event. These memoranda were issued to all personnel that are directly involved in the development of modification packages. The licensee's corporate organization also revised procedure SREP #6, Preparation and Control of a Modification Approval Record, on March 26 and implemented this procedure revision on June 25. This revision, in part, provided additional instruction on how safety evaluations are to be performed with particular emphasis on licensee revisions. The licensee's actions on this violation are complete.

(Closed) Inspector Followup Item (302/82-02-10): The licensee has implemented a vibration test program to determine the cause of future Make-Up Pump suction relief valve welds. This issue is being tracked in accordance with Inspection Followup Item (302/82-05-09) and this item is closed for record purpose.

(Closed) Inspector Followup Item (302/81-01-15): The non-safety related piping has been disconnected from the safety-related piping portion to prevent interaction between these systems. The licensee's actions with respect to the safety-related piping system is complete.

(Closed) Violation (302/82-05-03): The inspectors have reviewed the licensee's response to this violation dated May 21, 1981. The inspectors verified that SP-179 has been revised to include SAV 23, SAV 122, and LRV-46 in the leak rate test procedure and that these valves have been satisfactorily leak rate-tested. In addition, the inspectors verified that the licensee's Technical Specification (TS) change review cycle does include discipline engineers and supervisors in order to incorporate appropriate TS changes into the required procedures. The licensee's actions on this violation are considered complete.

4. Unresolved Items

Unresolved items are matters which more information is required to determine whether they are acceptable or may result in violations. One new unresolved item identified during this inspection is discussed in paragraph 5.b(7).

5. Review of Plant Operations

This inspection period commenced with the plant in Mode I, Power Operations. With the exception of seven reactor trips (see section 8 of this report for details) the plant continued in Mode I for the duration of the inspection period.

A. Shift Logs and Facility Records

The inspectors reviewed the records listed below and discussed various entries with operations personnel to verify compliance with TS and the licensee's administrative procedures.

Shift Supervisor's Log; Reactor Operator's Log; Equipment Out-of-Service Log; Shift Relief Checklist; Control Center Status Board; Auxiliary Building Operator's log; Chemistry/Radiation Log; Daily Operating Surveillance Log; Work Request; and Short Term Instructions (STI's).

In addition to these record reviews, the inspector independently verified selected clearance order tagouts.

During review of the STI's the inspector noted that STI 82-68 defined "ambient conditions" of the emergency diesel generators (EDG's) for testing purposes. This definition is necessary to assure that the EDG's will meet the Technical Specification surveillance requirements. The licensee will revise procedure SP-354, Emergency Diesel Fuel Oil Quality and Diesel Generator Monthly Test, to add this definition in the procedure prior to expiration of the STI.

Inspector Followup Item (302/82-11-01): Review revision to procedure SP-354 to include a definition of ambient conditions.

B. Facility Tours and Observations

Throughout the inspection period, facility tours were conducted to observe operations and maintenance activities in progress. Some operations and maintenance activity observations were conducted during backshifts. Also, during this inspection period, licensee meetings were attended by the inspectors to observe planning and management activities.

The facility tours and observations encompassed the following areas:

Security Perimeter Fence; Control Room; Emergency Diesel Generator Rooms; Auxiliary Building; Intermediate Building; Battery Rooms; and, Electrical Switchgear Rooms.

During these tours, the following observations were made;

- (1) Monitoring instrumentation - The following instrumentation was observed to verify that indicated parameters were in accordance with the Technical Specification for the current operational mode:

Equipment Operating Status; Area, atmospheric and liquid radiation monitors; Electrical system lineup; Reactor operating parameters; and, Auxiliary equipment operating parameters.

During observation of control room monitoring instrumentation, the inspector noted that radiation monitor recorder RMR-6 was a 24 point recorder with only 4 of the 24 points being used to record TS required radiation monitors. The other 20 points were not used and not bypassed resulting in an unnecessarily long time for the recorder to cycle through all 24 points with zeroes being printed for the unused points. The inspector brought this to the attention of the licensee and action was initiated to get the unused 20 points bypassed ensuring a minimum amount of time to complete the cycle between the 4 used points on the recorder. The inspector has no further questions on this item.

- (2) Safety Systems Walkdowns - Refer to section 12 of this report for a special inspection writeup on plant operating procedure review which included safety system walkdowns.
- (3) Shift Staffing - The inspectors verified by numerous checks that operating shift staffing was in accordance with Technical Specification requirements. In addition, the inspectors observed shift turnovers on different occasions to verify the continuity of plant status, operational problems, and other pertinent plant information was being accomplished.

No discrepancies were noted in this area.

- (4) Plant housekeeping conditions - Storage of material and components and cleanliness conditions of various areas throughout the facility were observed to determine whether safety and/or fire hazards exist.

No discrepancies were noted in this area.

- (5) Radiation areas - Radiation control area (RCA's) were observed to verify proper identification and implementation. These observations included selected licensee-conducted surveys, review of step-off pad conditions, disposal of contaminated clothing, and area posting. Area postings were independently verified for accuracy through the use of the inspector's own monitoring instrument. The inspectors also reviewed selected radiation work permits and observed personnel use of protective clothing, respirators, and personnel monitoring devices to assure that the licensee's radiation monitoring policies were being followed.

No discrepancies were noted in this area.

- (6) Security controls - Security controls were observed to verify that security barriers are intact, guard forces are on duty and access to the protected area (PA) is controlled in accordance with the facility security plan. Personnel within the PA were observed to insure proper display of badges and that personnel requiring

escort were properly escorted. Personnel within vital areas were observed to insure proper authorization for the area.

No discrepancies were identified in this area.

- (7) Surveillance Testing - Surveillance testing was observed to verify that: approved procedures were being used; qualified personnel were conducting the tests; testing was adequate to verify equipment operability; calibrated equipment, as required, were utilized; and Technical Specification requirements were followed.

The following tests were observed: SP-150, Operability and Functional Check of the Loose Parts Monitoring System; SP-421, Reactivity Balance Calculations (independently performed); SP-333, Control Rod Exercises; SP-335, Radiation Monitoring Instrumentation Functional Test (RMA-1 portion only); SP-113, Power Range Nuclear Instrumentation Calibration (section 6.5.a for NI calibration heat balance); SP-110, Reactor Protective System Function Monitoring (CHD Intermediate range rate and flux); RM-224, Radiation Monitoring Calibration (decon pit area monitor); SP-300, Daily Operating Surveillance Log; and, SP-312, Heat Balance Calculation.

As a result of these reviews, the following items were identified:

- (a) Procedure SP-113 provides for resetting of the hi flux trip setpoint to 85% when a main steam relief valve is inoperable. During review of the data sheet for this adjustment, the inspector noted that the voltage values for the normal hi flux trip setpoint did not contain voltage values for any special setpoints such as the 85% value. This special value was calculated by the instrument and controls (I&C) technician and inserted into the procedure without any formal procedure change process being utilized. The inspector discussed this issue with licensee representatives and determined that while both the Nuclear Shift Supervisor and I&C Supervisor reviewed these calculations prior to implementation, a formal procedure revision should be prepared to ensure adequate review of the revision.

Unresolved Item (302/82-11-02): Review licensee's action to resolve method for entering "special" hi flux setpoint changes into SP-113.

- (b) During observation and review of SP-335 the inspector noted that the procedure required the operator to observe the radiation monitors for an increase to within the expected value range as indicated on the meter face during source check. There are no labels or marks on the meter faces indicating the source value for each monitor. This method was previous practice but has now been replaced by a new

method whereby the most recent calibration data sheets for the radiation monitors are placed in the operators curve book. This issue was discussed with the licensee and the inspector was told that SP-335 would be updated to reflect the present practice of obtaining source check information.

Inspector Followup Item (302/82-11-03): Verify SP-335 is revised to reflect present method of obtaining source check information.

- (8) Maintenance Activities - The inspector observed maintenance activities to verify that: Correct equipment clearances were in effect; Work Requests (WR's), Radiation Work Permits (RWP's), and Fire Prevention Work Permits, as required, were issued and being followed; Quality Control personnel were available for inspection activities as required; and Technical Specification requirements were being followed.

The following maintenance activities were observed:

Replacement of "B" emergency diesel generator (EDG) exhaust manifold; Repair of reactor coolant pump (RCP)-B buswork; Replacement of radiation monitor (RM)-A1 pump; Adjustment and independent verification of containment purge valve (AHV-1D) throttled position; Inspection of "B" EDG bearings for wear; PM-1. E, Control Rod Drive Electrical checks; PM-135, Checkout of Security Tamper Alarm System; Calibration of condensate storage tank level transmitter; and, Vibration measurements on "A" makeup pump.

No discrepancies were noted in this area.

- (9) Operating Procedures - Operating Procedures (OP) were observed to verify that:

Approved procedures were being used; qualified personnel were performing the operations; and Technical Specification requirements were being followed.

The following procedures were observed:

OP-302, Reactor Coolant Pump Operation; OP-304, Soluble Poison Concentration control; OP-204, Power Operation; OP-210, Reactor Startup; and OP-203, Plant Startup.

No discrepancies were identified in this area.

- (10) Radioactive waste controls - Selected liquid and gaseous radioactive releases were observed to verify that approved procedures were utilized, that appropriate release approvals were obtained,

that required samples were taken, and that appropriate release control instrumentation was operable.

No discrepancies were identified in this area.

- (11) Pipe hangers and seismic restraints - Several pipe hangers and seismic restraints (snubbers) on safety-related systems were observed to insure that fluid levels were adequate and no leakage was evident, that restraint settings were appropriate, and that anchoring points were not binding.

No discrepancies were noted in this area.

6. Review of Licensee Event Reports (LER's) and Nonconforming Operations Reports (NCOR's)

- A. The inspector reviewed Licensee Event Reports (LER's) to verify that: The report accurately describes the event; The safety significance is as reported; The report satisfies requirements with respect to information provided and timeliness of submittal; Corrective action is appropriate; and, action has been taken. LER's 82-33, 82-35, 82-36, 82-37, 82-38, 82-39, 82-40, 82-41, 82-42, 82-43, and 82-44, were reviewed. This review identified the following items:

- (1) LER 82-37 reported weld failures on the suction piping relief valves for make-up pumps A and C at various times. The licensee has had similar weld failures in the past for these pumps (ref. NRC Inspection Reports 50-302/82-02 and 50-302/82-05) and is conducting an extensive vibration testing program to determine the cause of these failures. This issue will be tracked in accordance with Inspector Followup Item (302/82-05-09).
- (2) LER 82-44 is a 14 day followup report for the prompt reportable event of July 1, 1982, concerning the determination by the licensee that the seismic qualifications of hangers for power and control cable trays for safety-related circuits were not adequate. As a result of these findings, it was determined at 1800 on June 30 that the four high pressure injection motor-operated valves (MUV-23, 24, 25, and 26) could not be considered as operable and the plant was shutdown to Mode 3 (Hot Standby) by 0059 on July 1. Following modification of the cable tray hangers by 0230 on July 1, a plant startup was commenced and the plant was back in Mode 1 (Power Operations) by 0530. The licensee has implemented an extensive program to analyze and repair all hangers that are found to be seismically inadequate.

Inspector Followup Item (302/82-11-04): Review the licensee's progress in analyzing for seismic adequacy and repairing cable tray hangers.

- B. The inspector reviewed NCOR's to verify the following: Compliance with Technical Specification; Corrective actions as identified in the reports or during subsequent reviews have been accomplished or are being pursued for completion; Generic items are identified and reported as required by 10 CFR, Part 21; and Items are reported as required by the Technical Specifications.

The following NCOR's were reviewed: 82-125, 82-127, 82-133, 82-135, 82-137, 82-139, 82-140, 82-146, through 82-157, 82-159, 82-162, 82-163, 82-165 through 82-187, and 82-189 through 82-191.

As a result of this review, the following item was identified:

NCOR 82-176 reported the high alarming of radiation monitors RM-A2 and RM-A3 followed by evacuation of the auxiliary building. The cause of these alarms was traced to in progress venting of the RC Drain tank and the actual release was well within Technical Specification limits. During review of this event, the licensee determined that periodic checking of the various waste gas tank loop seals by use of the loop seal fill valves in addition to the visual checks on the site glasses would assure these seals are filled with water. The licensee will review the chem/rad and/or operations program to provide for such checks.

Inspector Followup Item (302/82-11-05): Review the Implementation of the waste gas tank loop seal fill program.

7. Review of IE Bulletin 79-15, Deep Draft Pumps

The licensee's final response for this Bulletin dated September 10, 1979 was reviewed. In a memorandum to Nuclear Reactor Regulation (NRR) from Mr. J. H. Sniezek on May 4, 1981, it was stated that there are no further questions on this subject.

Bulletin 79-15 is considered to be closed.

8. Reactor Trips

The plant experienced seven reactor trips during this report period. A summary of the reactor trips are as follows:

May 30, 1982 - Reactor trip initiated by turbine trip from 100% power as a result of an oil vapor or hydrogen gas explosion inside the main turbine pedestal bearing housing. The explosion was a result of the static collector elements on the main turbine rotor coming loose or being worn away such that a static charge was built up on the rotor. An auxiliary operator was attempting to take routine daily main turbine rotor position readings which caused the generation of sparks inside the pedestal bearing housing resulting in the explosion and subsequent turbine/reactor trip.

June 17, 1982 - Reactor trip on power/imbalance/flow from 100% power as a result of a plant runback due to the loss of one of four reactor coolant pumps (RCP's) on ground fault. The RCP tripped on ground fault due to rain leaking through the roof of the auxiliary building onto and into the RCP Power Monitor Cabinets causing arcing to ground on a bus bar.

June 20, 1982 - Reactor trip from 82% reactor power due to high reactor coolant system (RCS) pressure as a result of an operator inadvertently operating a main steam line rupture matrix test switch. This action caused closure of main steam line isolation valves and a resultant reactor trip on high RCS pressure.

July 5, 1982 - Reactor trip from 73% reactor power on high RCS pressure due to a main turbine load rejection as a result of a severe electrical storm causing numerous lightning strikes in the 500 KVA switchyard.

July 9, 1982 - Two reactor trips from approximately 20% power during attempts to bring the main turbine on the line subsequent to turbine electro-hydraulic control maintenance. Both reactor trips appeared to be anticipatory trips as a result of the main turbine being tripped above the anticipatory trip enable setpoint. One turbine trip was operator initiated due to problems in switching the main turbine from speed to load control. The cause of the other turbine trip could not be determined but is attributed to similar problems in switching the turbine from speed to load control.

July 15, 1982 - Reactor trip from 90% power on high RCS pressure as a result of a plant runback and feedwater re-ratio due to a failed RC flow transmitter amplifier card. The loss of the RC flow signal to the Integrated Control System (ICS) initiated the plant runback and feedwater re-ratio.

The resident inspectors reviewed these trips to ensure that safety systems operated as required, plant performance anomalies were identified, and corrective actions were initiated. As a result of these reviews the following items are identified for followup:

As a result of the first July 9 trip while attempting to place the main turbine back on the line, it was determined that post-trip review data was not available due to the fact that the plant computer was not reset subsequent to the manual turbine trip that had occurred earlier. The licensee has issued a short term instruction (STI) informing the operators to collect post trip review data subsequent to a turbine and/or reactor trip to ensure the computer is available for a subsequent trip. This STI will be followed up by a change to the Operation Section Implementation Manual (OSIM) and/or computer procedure.

Inspector Followup Item (302/82-11-06): Verify revision to OSIM and/or Computer procedure which specifies collection of post-trip review data after turbine and/or reactor trips to ensure computer is available for subsequent trips.

The licensee has issued an Unusual Operating Event Report (UOER) 82-09 for the May 30 trip, but the remaining six trip UOER's are still in draft form.

Inspector Followup Item (302/82-11-07): Review UOER for the June 17, 1982 reactor trip.

Inspector Followup Item (302/82-11-08): Review UOER for the June 20, 1982 reactor trip.

Inspector Followup Item (302/82-11-09): Review UOER for the July 5, 1982 reactor trip.

Inspector Followup Item (302/82-11-10): Review UOER's for the two trips of July 9, 1982.

Inspector Followup Item (302/82-11-11): Review UOER for the July 15, 1982 reactor trip.

9. Review of Temporary Modifications

Procedure CP-114, Procedure for Preparation of Permanent and Temporary Modifications, provides in part, a system by which temporary plant modifications are processed. Temporary modifications are completed in accordance with a Modification Approval Record (MAR) which insures that proper engineering review and approval is obtained, that safety evaluations have been conducted, that sufficient instruction is available to accomplish the modification, and that temporary modification is removed by the expiration date.

On July 19, the inspector conducted an audit of fifteen safety-related and security temporary modifications that appeared to have exceeded the expiration date. Of these fifteen, the following seven modifications were still outstanding:

| <u>No.</u> | <u>Title</u> | <u>Exp. Date</u> |
|--------------|--|------------------|
| MAR 78-08-63 | ACDP-25 Circuit #12 Replace 20 AMP Breaker with 40 Amp Breaker; | 12/31/78 |
| MAR 79-08-78 | Disable High Radiation Annunciator Alarm for RM-L4; | 6/1/82 |
| MAR 79-09-75 | Use Non-Quality Bonnet Gasket; | 6/1/82 |
| MAR 80-04-95 | Replace Hamlin Triac Relay #7641 with Hamlin Optic Isolated Solid State Relay; | 12/01/81 |
| MAR 81-06-40 | Install Additional closed circuit TV on South East corner of guardhouse; | 6/30/82 |

| | | |
|--------------|---|----------|
| MAR 81-07-11 | Furmanite leaking feedwater nozzle on A OTSG; and, | 12/31/81 |
| MAR 82-02-13 | Make-up nozzle Instrumentation (MUV-43). | 7/1/82 |

During a licensee audit conducted on May 5, 1982, MARS 78-08-63, 80-04-95, and 81-07-03 were identified as exceeding their expiration date. The licensee initiated corrective action to resolve this finding, however, as of July 19, 1982, this action had not been completed. Also, as of July 19, the remaining four modifications had not been extended or removed prior to the expiration date as required by CP-114.

Failure to adhere to the requirements of procedure CP-114 is contrary to the requirements of Technical Specification 6.8.1 and is a violation.

Violation (302/82-11-12): Failure to adhere to the requirements of procedure CP-114 for temporary modifications. See also paragraph 12.b.(1).

10. Receipt of New Fuel

The inspector verified prior to receipt of new fuel that technically adequate, approved procedures were available covering the receipt, inspection, and storage of new fuel; observed receipt inspections and storage of new fuel elements and verified these activities were performed in accordance with the licensee's procedures; and followed up resolutions of deficiencies is found during new fuel inspections.

No discrepancies were noted in this area.

11. Licensee's Annual Meeting with Law Enforcement Agencies

The inspector attended the licensee's annual meeting with the local law enforcement agencies. The following agencies were represented: FBI, Citrus County Sheriff's Department, U.S. Coast Guard, Florida Marine Patrol, Crystal River Police Department, and the Inglis Police Department.

The inspectors had no questions in this area.

12. Plant Operations Procedure Review

A. The inspectors reviewed selected plant operating procedures to verify that current design and as-built plant conditions are incorporated.

To accomplish this inspection, the procedures were compared to the facility Technical Specifications, System Flow Diagrams, and actual as-built configurations. Walkdowns of selected systems and plant personnel interviews were conducted.

The following procedures and their applicable Flow System Diagrams were reviewed:

- OP-207, Fire Protection System, Rev. 16;
- SP-363, Fire Protection System Tests, Rev. 13;
- SP-364, Hose Station Inventory and Hydrant Operability Test, Rev. 11;
- SP-365, Fire Pump Operability and Recirculation, Rev. 12;
- SP-366, Fire System Annual Valve Surveillance, Rev. 5;
- OP-406, Spent Fuel Cooling System, Rev. 16;
- OP-405, Reactor Building Spray System, Rev. 16;
- OP-408, Nuclear Services Cooling System, Rev. 22;
- OP-404, Decay Heat Removal System, Rev. 37;
- SP-349, Emergency Feedwater System Operability Demonstration, Rev. 30;
and,
- SP-354, Emergency Diesel Fuel Oil Quality and Diesel Generator Monthly Test, Rev. 32.

B. As a result of this inspection, two violations were identified:

- (1) The licensee uses Valve Check Lists to conduct and document valve lineups. Also, the licensee has replaced certain operating procedures (OP's) with surveillance procedures (SP's) based on the premise that these SP's will replace all system operations delineated in the OP's. Review of these valve check lists and SP's revealed the following discrepancies:
 - a. The OP's for the Emergency Feedwater (EFW) System and the Emergency Diesel Generator (EDG) system have been replaced by SP-349 and SP-354 respectively. Review of these SP's indicates that these procedures do not provide for filling, venting and draining of these systems. Furthermore, procedure SP-354 for the EDG does not contain any valve lineup for the diesel coolant system.
 - b. The fire protection system valve lineups are conducted in accordance with SP's 363, 364, 365, and 366. A review of these SP's indicates that some system valves are not included in the SP's (e.g., the isolation valves for the recently completed reactor building fire water standpipe).
 - c. Some of the checklists were missing valves.
 - d. The system walkdowns identified a number of examples where valves were not positioned as shown on the valve check list and no supporting documentation to explain these discrepancies could be located.

While the discrepancies noted during this inspection did not have an immediate effect upon system operability, such inaccuracies can result in degraded system operation.

Failure to provide procedures for filling, venting and draining and failure to maintain procedures is contrary to the requirements of Technical Specification 6.8.1 and Regulatory Guide 1.33 and is considered a violation.

Violation (302/82-11-12): Failure to have procedures for system filling, venting, and draining and failure to maintain procedures. See also paragraph 9.

(2) During system walkdowns, it was determined that System Flow Diagrams contained numerous errors. The following are examples of these errors:

- a. The licensee utilizes a stamp "CHANGE IN PROGRESS DUE TO M.A.R./R.E.I. #(number of item)" to alert personnel using the diagram that a plant modification (MAR) is in progress and that the diagram has not yet been changed to show this modification. When the diagram has been revised to reflect the new modification, the stamp is removed.

Review of these MAR stamp identified several instances where MAR numbers showing on the diagram did not apply to the system diagrammed or were cancelled or closed and not removed from the diagram.

Based on this finding, the inspectors expanded the scope of the inspection by reviewing several modifications in progress and checking these modifications against applicable diagrams. This review revealed that several of these modifications were not identified on the diagrams.

The licensee apparently controls the use of the MAR stamp in accordance with Production Engineering Department Administrative Procedure Number 8 entitled "Interim Drawing Control". This method of control does not appear to be effective in assuring that diagrams reflect current plant conditions. In addition, the use of the stamp does not provide adequate information to plant operators (since the stamp only lists a MAR number and does not provide information as to the effect of the MAR).

- b. There are a number of examples on the diagrams where:

-Valves are missing (e.g., instrument root valves);

-Valves are shown incorrectly (e.g., they do not exist, they are in a different location or are for a different use than indicated); and,

-Actual piping configuration is different than shown on the diagram.

Failure to maintain and control drawings is contrary to the requirements of 10 CFR 50, Appendix B Criterion V and VI and to the requirements of the Florida Power Corporation (FPC) Operation QA Program and is considered a violation.

Violation (302/82-11-13): Failure to maintain drawings and to maintain drawing controls.