

USNRC REGION 3
ATLANTA, GEORGIA

82 NOV 8 P 3: 03

**Florida
Power**
CORPORATION

November 3, 1982
#3F-1182-04
File: 3-0-3-a-2

Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Ga. 30303

SUBJECT: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report 82-18

Dear Mr. O'Reilly:

Florida Power Corporation hereby submits its response to the items of non-compliance identified on the subject Inspection Report as transmitted by letter dated October 5, 1982.

A. VIOLATION

Technical Specification 6.8.1a requires adherence to procedures required by Appendix A of Regulatory Guide 1.33, November, 1972. Regulatory Guide 1.33, Section 1.3e requires a written procedure for the repair or replacement of steam safety valves. Procedure SP-650, Main Steam Code Safety Valves Test, Revision 5, which is used during corrective maintenance to reset the main steam code safety valves, states in step 6.3.1 that "The man in charge of performing this activity shall initial the Check Off List after each step identified by an "X" in the margin is performed".

Contrary to the above, on August 9, 1982, maintenance to reset main steam code safety valve MSV-33 was performed in accordance with the procedure SP-650 and the Check Off List was not utilized nor initialed until all maintenance was completed.

This is a Severity Level V Violation (Supplement I). Related cited violations which address the area of failure to follow procedures during safety-related maintenance are identified in reports 50-302/81-13, 81-21, 82-02 and 82-11.

A. RESPONSE

Florida Power Corporation concurs with the stated violation.

This violation was caused by personnel error and a possible procedural inadequacy. Maintenance personnel are often required to work in environments, such as thermally

8301040470 821220
PDR ADDOCK 05000302
G PDR

and/or radiologically hot areas, where timely completion of a task is of great importance. With the Check Off List on separate pages from the procedures, personnel spend a significant amount of time turning pages back and forth while following procedures and initialing the Check Off List. Personnel evidently judged that timely completion of the maintenance on the main steam code safety valves was of greater concern than initialing the Check Off List after each step was completed.

Maintenance personnel were instructed on the importance of using the Check Off List after each step. An investigation to determine procedural changes (i.e., utilize procedure sign-off rather than a Check Off List in those procedures where time is a major concern) has been initiated to prevent recurrence. Full compliance will be achieved March 19, 1983.

B. VIOLATION

10 CFR 2.201 (a) requires the licensee to respond to a notice of violation within twenty days of the date of the notice or other specified time. The Notice of Violation specifies thirty days from the date of the notice.

Contrary to the above, the licensee did not respond to two notices of violation within the time specified on the notices. A notice of violation associated with NRC Inspection Report No. 50-302/81-23 required response by March 22, 1982, but the response was not received by the Region II office until after May 27, 1982. Another notice of violation associated with Inspection Report No. 50-302/82-10 required a response by July 18, 1982, but the response was not received by the Region II office until after August 2, 1982.

This is a Severity Level V Violation (Supplement 1).

B. RESPONSE

Florida Power Corporation concurs with the stated violation.

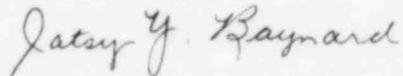
This violation was caused by personnel error in the support group charged with review and final preparation of such responses. Tracking systems intended to prevent such errors from occurring were apparently inadequate.

Personnel involved have been counselled with respect to the importance of timeliness of required responses and improved interim tracking systems have been established.

J. P. O'Reilly
#3F-1182-04
Page -3-

Long term corrective actions include improved staffing (already achieved), improved administrative control (in preparation) and the continued improvement of tracking systems. We consider the current controls to be in full compliance as of this date.

Very truly yours,



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

PGH/mm