

**Florida  
Power**  
CORPORATION

September 13, 1990

3F0990-08

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

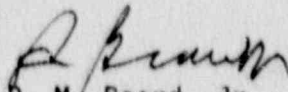
Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License DPR-72  
Inspection Report 90-23

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the subject inspection report.

Should there be any questions, please contact this office.

Yours very truly,

  
P. M. Beard, Jr.  
Senior Vice President,  
Nuclear Operations

WLR:mag

Att.

xc: Regional Administrator, Region II  
Senior Resident Inspector

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FLORIDA POWER CORPORATION  
INSPECTION REPORT 90-23  
REPLY TO NOTICE OF VIOLATION

VIOLATION 90-23-01

10 CFR 50, Appendix B, Criterion XVII, and the licensee's accepted Quality Assurance (QA) Program (FSAR Section 1.7.1.17) collectively require that sufficient records be maintained to furnish evidence of activities affecting quality, including tests, and that the records be retrievable. In addition, the licensee's surveillance procedure SP-102, Control Rod Drop Time Tests, as performed on June 20, 1990, required that the Visicorder traces, used to measure and confirm that control rod drop times were acceptable, be attached to the completed procedure and be transmitted with it to the records vault.

Contrary to the above, the Visicorder traces obtained on June 20, 1990, could not be produced for inspection either during the inspection or in the following week.

This is a Severity Level V violation (Supplement I).

FLORIDA POWER CORPORATION RESPONSE

ADMISSION OR DENIAL OF ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR VIOLATION

The Visicorder traces were apparently separated from the work package and lost after the performance of SP-102 and prior to the electric shop's review of the procedure.

SIGNIFICANCE OF THE VIOLATION

Because the information from the traces required for confirming that control rod drop times were acceptable was documented on data sheets, it is not considered significant that the Visicorder traces were not attached to the work package. These data sheets are part of procedure SP-102 that was performed on June 20, 1990, and are part of FPC's quality records.

CORRECTIVE ACTIONS

FPC's attempt to locate the Visicorder traces was unsuccessful. FPC verified the data sheets from SP-102 were adequate to confirm acceptable control rod drop times.

DATE OF FULL COMPLIANCE

Although the Visicorder traces were not attached as required by SP-102, FPC has maintained sufficient retrievable records to provide evidence of activities as described in SP-102. FPC is in full compliance with its Quality Assurance Program.

CORRECTIVE ACTIONS TO PREVENT RECURRENCE

A training session was conducted with electric shop supervisors who are responsible for reviewing completed work packages. The training session stressed the importance of making sure attachments are part of the work package when required by the procedure.

In addition, the violation will be discussed with all electric shop personnel to stress the importance of making sure all attachments are properly affixed to work packages.