



**Florida
Power**

CORPORATION
Crystal River, Florida 34413
Docket No. 50-302

September 28, 1990
3F0990-14

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

Subject: Notice of Violation - NRC Inspection Report 90-24

Reference: NRC to FPC letter dated 8/31/90

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.

Sincerely,

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

WLR:mag

Att.

cc: Regional Administrator, Region II
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 90-24
REPLY TO NOTICE OF VIOLATION

VIOLATION 90-24-01

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for those activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, Section 9.e(1), obtaining permission and clearance to perform work.

Compliance Procedure (CP) 115, "Nuclear Plant Clearance Orders", section 4.8.3, requires that when a clearance is released, that the tags be removed and the system be restored in the reverse order in which the tags were hung.

Contrary to the above, on July 10, 1990 at approximately 7 a.m. while releasing Work Request 90-07-036, the valve realignment sequence was violated in that the air dryer bypass valve was closed first instead of last. This caused a partial loss of instrument air.

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

FLORIDA POWER CORPORATION RESPONSE

ADMISSION OR DENIAL OF ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR VIOLATION

The violation was a result of personnel error. The error was caused by Operator oversight of the procedural guidance to release the clearance in the reverse sequence. Two contributing factors were involved. The Shift Supervisor on Duty (SSOD) exhibited poor judgement in assigning restoration of the clearance to an Operator unfamiliar with the Instrument Air system. In addition, the Clearance Order form used in the field did not specifically remind the operator to restore the system in reverse sequence.

CORRECTIVE ACTIONS

The air dryer bypass valve was reopened and the Instrument Air system was restored to the proper configuration. A human performance evaluation was performed to determine why the incident occurred.

DATE OF FULL COMPLIANCE

Full compliance was achieved upon proper restoration of the system. The system was restored immediately after the incident.

CORRECTIVE ACTIONS TAKEN TO PREVENT RECURRENCE

The Shift Supervisor On Duty and the Operator releasing the clearance were counseled on the incident. The clearance order form will be revised to require a separate restoration column with the restoration sequence designated on the form.