

I. General

Steps have been taken to correct specific weaknesses in the areas of emergency planning, plant operations, training, and radiation protection as identified in the noncompliances and escalated enforcement actions referenced below. Licensee corrective actions have been reviewed and onsite inspection performed where necessary. An enforcement conference was held with senior licensee management to discuss specific problems and corrective actions. Programmatic improvements were made in a major reorganization of the licensee's staff including replacement of the plant Manager, and reassignment of training responsibilities to a corporate Vice President.

II. Specific

A. Contention

"The Crystal River 3 facility displayed evidence of weaknesses in four functional areas. These areas were emergency planning, plant operations, training, and radiation protection."

The basis NRC actions, and license corrective actions for this contention are discussed in contentions B-G below.

B. Contention

"The licensee had problems meeting the requirements of its emergency plan. These problems had been resolved by the implementation of the new emergency plan."

1. Basis

The NRC reviewed the Crystal River Unit 3 Emergency Plans as a result of new acceptance criteria for evaluating licensee, state and local emergency plans jointly developed by NRC and the Federal Emergency Management Agency, NUREG-0654. The review of the site emergency plan indicated that additional information and commitments were required before the NRC could conclude that the onsite program met the evaluation criteria stated in NUREG-0654. The review determined that several elements were not adequately addressed in the plan.

Florida Power Corporation was requested to review their site emergency plan against criteria of NUREG-0654 and provide NRC a revised plan.

References

NRC letter of 6/24/80

2. NRC Action

The NRC is scheduled to conduct an Emergency Preparedness Appraisal in August, 1981, at the Crystal River Unit 3 Nuclear Power Plant. The Appraisal team will be composed for four members, with the team leader being a senior NRC Office of Inspection and Enforcement individual. The appraisal will be performed during a 2-week period at the licensee's nuclear power reactor site and is to involve review of records, discussions with plant personnel, observation of work practices and conduct of independent measurements by team members.

This appraisal will determine whether there is reasonable assurance that appropriate assessment and protective measures can and will be taken in the event of a radiological emergency.

No inspections were conducted during this evaluation period. However, subsequent inspections will monitor licensee's progress in implementation of corrective actions as a result of the above Emergency Preparedness Appraisal. These and related topics were discussed with senior licensee management at a meeting on October 30, 1980.

NRC letter of 5/13/81
NRC Temporary Instruction
2515/55
10CFR Part 50.47(b)
NUREG-0654
NRC letter of 11/13/80
NRC letter of 10/31/80

3. Licensee Corrective Action

The licensee forwarded a Draft Emergency Plan (dated 12/17/80) to the NRC in December, 1980. The licensee also forwarded Emergency Plan Implementing Procedures in response to NRC requests in October, 1980, and February, 1981.

References

Licensee letters of
2/28/80, 12/31/80 and
2/27/81

C. Contention

"The plant operations area was characterized by numerous items of noncompliance and instances where operators failed to adhere to plant procedures, conducted activities without procedures, or changed procedures without conducting the required reviews."

1. Basis

There were several instances of personnel failing to follow procedures, conducting activities without procedures, or changing procedures without the required reviews. Examples included the failure to complete surveillance data sheets; failure to follow surveillance procedures resulting in an error in control rod drop time measurements; failure to correctly perform heat balance computations; radioactive releases from the turbine building; technical specification violations for not correctly reducing reactor power levels; surveillances not conducted as required; and temporary procedures not properly reviewed.

References

IE Rpt. 50-302/79-13
79-26, 79-29, 79-35,
79-39, 79-41, 80-3,
80-13
LER 79-72, 81, 83, 8

2. NRC Action

These and related topics were discussed with senior licensee management, at meetings on April 22, 1980, and October 30, 1980. In addition, enforcement conference was held on March 23, 1979. Areas discussed involved enforcement history, licensee reported events, safety performance, significant operational events, radiation protection, environmental controls, security, operational quality assurance, and procedural and administrative controls. Specific concerns in the area of management control systems and the implementation of those systems were high-lighted during the meeting. The need for adequate procedural and administrative controls, generic application of corrective actions implemented in deficient areas, and timeliness in implementing corrective actions were stressed.

IE Rpt. 50-302/79-14

Two Immediate Action letters addressing the operations area were issued in August 1979, and March 1980. Another management meeting was held in December, 1979 to discuss the licensee's action resulting from the March meeting and further planned corrective action.

3. Licensee Corrective Action

The licensee has taken specific corrective actions in response to the identified items of noncompliance and events described in the referenced LER's. As a result of these concerns, major changes in the licensee's organization and plant management have occurred.

IE Rpt. 50-302/79-44
79-47, 80-15

D. Contention

"Training program weaknesses contributed to personnel errors and items of noncompliance."

1. Basis

There were several areas identified in the licensee's training program which contributed to personnel errors and items of noncompliance. These areas included reductions in training program requirements for operators, and failure of operators to meet training requirements. The licensee also failed to implement a training program effectiveness evaluation requirement, and some annual retraining requirements were not met.

References

IE Rpt. 50-302/79-23,
79-50

2. NRC Action

A management meeting was held in December, 1979, at the licensee's request, to review corrective actions in the area of training as well as other areas. These and related topics were also discussed with senior licensee management at a meeting on October 30, 1980.

3. Licensee Corrective Action

The licensee has taken specific corrective actions in response to the items of noncompliance. Additionally, the responsible manager for training was changed from the Plant Manager to the Vice President for Nuclear Operations.

IE Rpt. 50-302/80-30,
81-08

E. Contention

"Required training activities were not completed on several occasions."

1. Basis

There were several instances identified where the licensee did not implement his approved training program. These included failure to involve in lectures those operators scoring low on requalification exams and not generating evaluations of training effectiveness.

References

IE Rpt. 50-302/79-23

2. NRC Action

A management meeting was held in December, 1979, at the licensee's request, to review corrective actions in the area of training as well as other areas. These and related topics were also discussed at a meeting with senior licensee management, held on October 30, 1980.

3. Licensee Corrective Action

The licensee has taken specific corrective actions in response to the item of noncompliance. Additionally, the responsible manager for training was changed from the plant manager to the Vice President of Nuclear Operation.

IE Rpt. 50-302/80-30,
81-02

F. Contention

"The radiation protection area was characterized by numerous items of noncompliance, weaknesses in the exposure and contamination control programs, and inadequate control over liquid and solid radioactive waste

1. Basis

Examples of weaknesses in the exposure and contamination control programs include lack of procedures addressing the marking of radioactive containers, failure to maintain required barriers, failure to properly label contaminated materials, and failure to control temporary lead shielding.

References

IE Rpt. 50-302/879-15,
79-54

Examples of inadequate control over liquid and solid radioactive waste include improper radioactive material shipment, release of contaminated materials to unrestricted areas at concentrations higher than allowable, inadequate radioactive release procedures, and improper handling of contaminated coveralls.

IE Rpt. 50-302/79-15,
79-35, 80-15

2. NRC Action

Following each inspection, the NRC issued notices of violation. These and related topics were discussed with senior licensee management in a meeting on October 30, 1980.

IE Rpt. 50-302/79-15,
79-35, 79-54, 80-15

3. Licensee Corrective Action

The licensee has taken the specific corrective actions necessary to prevent further occurrences of non-compliances in the areas addressed.

IE Rpt. 50-302/80-15,
81-08

G. Contention

"During the evaluation period, the licensee initiated organizational and staffing changes to provide a higher level of management attention and a greater resource allocation to deal with identified problem areas."

1. Basis

The licensee has made several organizational changes to correct problem areas identified by both the NRC and itself. These changes included replacement of the plant manager, and splitting of the nuclear engineering and procurement staffs and reassigning them to the site. Training was removed from the responsibility of the plant manager and reassigned to the Vice President of Nuclear Operations.

References

2. NRC Action

Subsequent regional inspections under the routine inspection program as well special inspections such as the Health Physics Appraisal and Performance Appraisal Team inspection have indicated improvement caused by this reorganization. It should be noted that not all positions in the revised structure have been filled and therefore the full benefits of the reorganization have not been attained. These and related topics were discussed with senior licensee management at meetings on April 22, 1980, and October 30, 1980.

50-302/81-1 (PAS)
50-302/80-25

3. Licensee Corrective Action

The licensee has reorganized and is filling vacant positions. =

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