



**Florida
Power**

CORPORATION

Crystal River Unit 3
Docket No. 50-302

December 5, 1990
3F1290-02

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

Reference: NRC letter to FPC dated 11/07/90
Notice of Violation - NRC Inspection Report 90-32

Dear Sir:

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

Sincerely,

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

WLR:mag

Enclosure

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 90-32
REPLY TO NOTICE OF VIOLATION

VIOLATION 90-32-01

Technical Specification 3.6.1.1 states that containment integrity shall be maintained in modes 1, 2, 3, and 4. The action statement requires that without containment integrity restore containment integrity within one hour or be in at least hot standby within the next six hours.

Contrary to the above, on September 18, 1990, from about 4:30 a.m. to 7:00 p.m., containment integrity for Crystal River Unit 3 was not maintained while in Mode 1 in that a flow path existed between the containment sump and vent/drain in the decay heat (DH) system through containment isolation valve DHV 43. Valve DHV 43 had been cycled at 4:30 a.m. to prepare for maintenance on the DH system. Unknown to the licensee, DHV 43 did not fully shut after performing the cycling and disabling evolution.

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

FLORIDA POWER CORPORATION RESPONSE

ADMISSION OR DENIAL OF ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation. This violation was reported in accordance with 10CFR50.73 as LER 90-14.

REASON FOR VIOLATION

DHV-43 was not fully closed after performing the cycling and de-energizing evolution for maintenance. When the valve "closed" indication was received, the operator opened the breaker removing closing power from the valve prior to the torque switch actuating. This stopped disc travel before the valve disc was fully seated. The valve "closed" indication had been received; however, the "closed" light is operated by a geared limit switch, whereas the motor-operator power, while closing, is controlled by a torque switch. Allowing the valve to "torque-out" while closing ensures the valve is fully seated and leak-tight. Valve movement after the closed light is proportional to the valve stroke time. The longer delay times are unique to the 120 second stroke valves such as DHV-43. Subsequent testing has shown DHV-43 continues to build up torque, seating the valve, for approximately seven seconds after the "closed" light illuminates. This fact was not known to the operators at the time of the event. When the green indicating light illuminated at the switchgear, the operator verified the closed indication with the control room operator and opened the breaker for DHV-43.

CORRECTIVE ACTION

As soon as it was determined that DHV-43 was not fully seated, DHV-43 was manually seated using the handwheel. The motor operator was inspected and found to be operating correctly. The information and lessons learned concerning the violation were immediately disseminated to the operating shifts through an Operations Study Book entry, emphasizing the containment integrity aspect of the event.

DATE OF FULL COMPLIANCE

Full compliance was achieved at 1900 on September 20, 1990 when DHV-43 was manually seated and containment integrity was re-established.

ACTIONS TAKEN TO PREVENT RECURRENCE

This event and the purpose of the "closed" light and torque switch will be included in the first requalification cycle of 1991. The parallel between valves like DHV-43 and throttle-type valves, where it is commonly known that switches must be held in the closed position for a period of time after the "closed" light illuminates, will be emphasized.