

# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302

May 27, 1994  
3F0594-15

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

Subject: Notice of Violation - Revised Response  
NRC Inspection Report No. 50-302/93-16

Reference: A. NRC to FPC letter, 3N1293-40, dated December 30, 1993  
B. FPC to NRC letter, 3F0194-08, dated January 14, 1994  
C. NRC to FPC letter, 3N0294-04, dated February 10, 1994  
D. FPC to NRC letter, 3F0394-08, dated March 10, 1994  
E. NRC letter to FPC, 3N0594-01, dated May 2, 1994

Dear Sir:

Florida Power Corporation (FPC) provides the attached revised response concerning the Notice of Violation identified in reference C. There were some statements in the NRC reply (reference E) to our initial response where our judgement differs. FPC does not consider it productive to continue to attempt to resolve these disagreements within the framework of the Enforcement Process. A key disagreement involves our plant specific example of using PSA insights. This generic issue is currently being addressed by the NRC and the industry. As active members of the NEI Regulatory Threshold Working Group, we are working to support the industry's part of the resolution of this issue. The NEI "PSA Application Guidelines" are currently scheduled to be issued late this year. The related NRC Policy Statement is being developed on a similar schedule. We believe this Policy Statement and the Guidelines will form the essential tools necessary to address this issue.

Thus, we have accepted the violations previously denied and are taking action to address them. In one case, we are making the change encouraged by the NRC and in the other we have a schedule for doing so. Attachment 1 provides the revised

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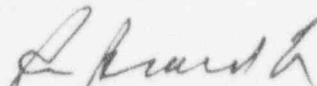
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response to the violations we previously denied. Also included in Attachment 1 is a response to your request for a more definitive action plan.

We appreciate the frank discussion we have had on these issues and are confident our differing professional judgments can and will be resolved. In this regard we will schedule a meeting with the NRC staff.

Sincerely,



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

PMB/RLM/PVF

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

FLORIDA POWER CORPORATION  
NRC INSPECTION REPORT NO. 50-302/93-16  
REPLY TO A NOTICE OF VIOLATION

RESTATEMENT OF VIOLATION 50-302/93-16-01 (examples 1.a. and 1.b.)

- A. 10 CFR 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.
1. Contrary to the above, on December 11, 1993, several Emergency Operating and Abnormal Operating Procedures were inadequate as evidenced by the following examples:
- a. Emergency Operating Procedure 03, "Inadequate Subcooling Margin," did not contain appropriate guidance to mitigate small break loss of coolant accident with loss of all high pressure injection.
- b. Emergency Operating Procedure 14, Enclosure 6, could not be performed as written because the procedure did not direct the operator to open Valve CXV-358.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts both Violations.

REASON FOR THE VIOLATION

- 1.a. FPC evaluated the event in terms of risk (probability & consequences) and determined that adequate guidance for the only risk significant sequence should be provided in the Station Blackout procedure.
- 1.b. When EOP-14 was written, CXV-358 was the closest source of demineralized water, and CXV-358 is but one option available to the operator. It was part of a reasonably routine evolution and posed no difficulty to the operators observed by the NRC or others with which we have discussed it. We also acknowledge that the procedure did not direct the opening of MSV-524, or provide the other specific actions listed in the enclosure to reference E. Again, we considered these to be within the normal knowledge and skills of operators.

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

- 1.a. Initial actions included developing an information aid for the operating staff to make them aware of SBLOCA without HPI events. As an interim action FPC is developing an Operations Study Book entry to discuss this in more detail until final resolution is achieved. FPC will resolve this issue following the conclusion of the B&W Owners Group Operator Support Committee meeting, currently scheduled for August, 1994. This meeting will also address the results of the recent generic technical guideline validation efforts conducted at the CR-3 site specific simulator.
- 1.b. No immediate corrective actions were required for this example.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

- 1.a. The development of a controlled EOP cross-step and deviation document, and coordinating Owners Group efforts to determine the best location to place the related mitigative actions, are adequate measures to prevent recurrence.
- 1.b. EOP-14, Enclosure 6 will be revised to provide more definitive pre-analyzed course of actions for operators to provide a flow path such as opening valves and removing vent caps (addressing all of the examples in your May 2, 1994 letter).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- 1.a. All procedure changes will be completed by October, 1994.
- 1.b. The procedure revision will be completed prior to restart from Refuel 9, currently scheduled for June 6, 1994.

RESTATEMENT OF VIOLATION 50-302/93-16-05 (example 3.)

- E. Technical Specification 6.8.1 required, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Regulatory Guide 1.33 listed various safety-related administrative activities including Procedure Review and Approval.

A1-402C, "EOP Verification and Validation Plan," required that the originator of the procedure verification designate independent reviewers to perform enclosure 2 of the procedure (Evaluation Criteria for Procedure Verification).

Contrary to the above, on December 11, 1993, the licensee had not performed verifications and validations on 14 Emergency Operating Procedures in accordance with the procedural requirements of A1-402C as evidenced by the following example:

3. Emergency Operating Procedure 14, Enclosure 6, "OTSG Blowdown Lineup," was not adequately validated. Step 1.1.1 of A1-402C Enclosure 4 required that the procedure contain sufficient information to perform the specified actions. The procedure could not be performed as written because the procedure did not direct the operator to open Valve CXV-358.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

FPC accepts the Violation.

REASON FOR THE VIOLATION

As discussed in responses to Violation 50-302/93-16-01, example 1.b. above, the procedure was purposely written to allow any source of water to be used and this step was considered to be within the knowledge and skills of operators. We agree that our validation process warranted improvement.

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

The Verification and Validation Procedure has been revised to improve methods for performing such tasks.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

EOP-14 will be revised to be more definitive on operator action required to provide a flow path such as opening valves and removing vent caps.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The EOP-14 procedure revision will be completed prior to restart from Refuel 9, currently scheduled for June 6, 1994. As noted above, the verification and validation procedure has been revised and is being used on all EOP revisions.

REQUEST FOR A MORE DEFINITIVE EOP ACTION PLAN

A specific Action Plan was developed and transmitted to the NRC by reference B. The current status of each action is as follows:

ACTION	STATUS
1. ASSEMBLE TEAM TO DISCUSS MILESTONES, RESPONSIBILITIES, ACCOUNTABILITIES AND LOGISTICS.	COMPLETE
2. UPDATE, REVIEW AND APPROVE THE DEVIATION DOCUMENT USING GTG REV. 7.	UPDATE AND REVIEW COMPLETE. APPROVE BY RESTART (JUNE 6, 1994)
3. REVISE AND APPROVE EOP WRITER'S GUIDE.	SECOND REVISION IN PROGRESS
4. REVISE AND APPROVE EOP VERIFICATION AND VALIDATION PLAN.	COMPLETE
5. REVISE ABNORMAL PROCEDURES (APs) TO CORRECT VALID DEFICIENCIES.	COMPLETE
6. PERFORM SAFETY EVALUATIONS (50.59) ON ALL EXISTING EOPs AND SAFETY-SIGNIFICANT GTG DEVIATIONS.	COMPLETE
7. PERFORM VERIFICATION ON ALL EOPs.	COMPLETE
8. PERFORM VALIDATION AS NEEDED ON EOPs.	COMPLETE
9. REVISE EOPs TO CORRECT VALID NRC DEFICIENCIES.	COMPLETE BY RESTART (JUNE 5, 1994)
10. PERFORM QUALITY PROGRAMS EVALUATION.	COMPLETE BY RESTART (JUNE 6, 1994)

LONG TERM ACTIVITIES:

As a result of the verification and validation performed on the EOPs, a number of discrepancies and comments were documented. Most consist of format and detail inconsistencies. However, several indicate the need to either further revise the EOPs or develop casualty type (or abnormal) procedures to cope with certain events or conditions. FPC is currently developing a follow-on action plan to manage this effort.