



Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

December 2, 1994
3F1294-04

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

Subject: Notice of Violation
NRC Inspection Report No. 50-302/94-22

Reference: NRC to FPC letter, 3N1194-02, dated November 4, 1994

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the subject Notice of Violation.

Sincerely,

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

PMB/EEF:ff

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

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A Florida Progress Company

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FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/94-22
REPLY TO A NOTICE OF VIOLATION

VIOLATION 50-302/94-22-03

10 CFR 50, Appendix B, Section V, requires that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Contrary to the above, Chemistry Instruction CH-123, Determination of Particulate Contamination in Diesel Fuel, did not include sufficient details to provide an accurate method for testing of Emergency Diesel fuel oil in quantities less than one liter. As a result, Emergency Diesel fuel oil that exceeded procedural limits was accepted and mixed with stored fuel, resulting in the stored fuel being outside of the procedural limits.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

Chemistry Procedure CH-123 did not provide sufficient guidance in the use of sample sizes other than one liter. During the performance of the analysis in September problems were encountered while filtering the entire one liter sample. A determination was made that the procedure allowed latitude in the splitting of the sample and filtration of a smaller volume for determination of meeting required limits. The guidance provided in the procedure, however, was not adequate to assure a representative aliquot was obtained and filtered. Particulate matter contained in the smaller sample split from the one liter container was not properly transferred to the filtration apparatus thereby causing the analytical result to be less than the actual concentration of particulate matter present in the sample.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Both underground tanks were recirculated through a filter to reduce the particulate levels, although the procedural limit was exceeded in only one of the tanks.

CH-123 was revised to provide improved guidance on the analysis of diesel fuel in order to assure satisfactory comparison of analytical results to acceptance criteria. The revised procedural guidance requires the use of a minimum of one liter of sample for diesel fuel receipt analysis. It also addresses the proper methodology for the use of sample sizes of less than one liter for routine tank sampling and analysis. Also the event was discussed with appropriate chemistry and system engineering personnel to ensure an understanding of the lessons learned.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No further corrective action is to be taken.

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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The procedure was revised on October 10, 1994 to incorporate the new guidance on the analysis of particulate contamination in diesel fuel. Full compliance has been achieved.