

JUN 27 1984

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Florida Power Corporation  
ATTN: Mr. W. S. Wilgus  
Vice President Nuclear Operations  
P. O. Box 14042, M.A.C. H-2  
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: REPORT NO. 50-302/82-09

We have completed our evaluation of your response to Violation B pertaining to calibration of seismic instrumentation in your letter dated June 25, 1982.

As a point of clarification, the referencing of other procedures that discuss a methodology outside the scope of a procedure is acceptable as long as these referenced procedures receive the detailed review specified in the Technical Specifications. Procedure SP-154 could not be conducted without the step-by-step instruction provided by the vendor procedure, thereby making this procedure an integral part of SP-154. Therefore, to insure an adequate review is being conducted, SP-154 and the referenced vendor procedure must receive the same level of review.

We also note your position that the seismic instrumentation is not safety-related. While we will not dispute this position, this instrumentation is a license condition specified in your Technical Specifications and as such has operability requirements that must be periodically demonstrated by surveillance testing. Additionally, Technical Specification 6.8.1a requires implementing procedures for each surveillance test listed in the Technical Specifications. Therefore, these surveillance test procedures are required to receive the review requirements specified in 6.8.2 of the Technical Specifications.

Based upon this evaluation, we have concluded that the violation occurred. However, since the time that this violation has occurred, substantial changes have been made to your procedure review process (Amendment 57 to the Technical Specifications). In addition, our resident inspector has reviewed procedure SP-154 that was recently performed and noted that the vendor's procedure has been incorporated into SP-154 and that the total procedure has been reviewed as required by your present Technical Specification. Therefore, we feel your corrective action has been completed and that further response to this issue is not required.

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We appreciate your cooperation in this matter.

Sincerely,

James P. O'Reilly  
Regional Administrator

cc: E. M. Howard, Director  
Site Nuclear Operations  
P. F. McKee, Nuclear Plant Manager  
G. R. Westafer, Manager  
Nuclear Operations Licensing and  
Fuel Management

bcc: NRC Resident Inspector  
Document Control Desk  
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