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June 25, 1991

CERTIFIED MAIL - P 397 879 423  
RETURN RECEIPT REQUESTED

Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

RE: Suspension or revocation of the nuclear  
operating license for Florida Power's  
Crystal River Nuclear Plant (CR3)

Dear Sir:

I am writing on behalf of my client, Edward S. Wollesen, pursuant to 10 CFR Part 2, Appendix C, § V.B.7, and 10 CFR § 2.206, to request that the NRC institute a proceeding pursuant to 10 CFR § 2.202, to suspend or revoke the operating license of Florida Power's Crystal River nuclear plant, or for such other action as may be proper.

The specific grounds for this request are observations of my client during his employment as a Senior Quality Assurance Auditor for Florida Power Corporation at its Crystal River nuclear power plant (CR3) until his termination on May 10, 1991. These observations include the following:

1. 1,500 to 3,000 instruments in the nuclear plant, most of which are identified to be safety related or important to safety, are not being controlled as required by the regulations of the Nuclear Regulatory Commission, that is, they are not properly identified and are not in a proper calibration program. Therefore, the operability of these instruments, which are relied upon by the nuclear operators, is questionable. This is obviously a very serious nuclear safety concern. In more technical terms, these instruments are not in Florida Power's Configuration Management Information System (CMIS), therefore there are no controlled calibration data sheets relating to these instruments. As a result, it is impossible for Florida Power to determine that

the instruments meet or remain within their engineering design standards as required by the NRC. Further, the engineering diagrams of the nuclear plant do not include these instruments, and the diagrams are not representative of the actual configuration of the plant, as required by the NRC.

2. Florida Power stated in recent Quality Audit Reports (which are required by the NRC under Florida Power's license commitments) that various audited programs, including Security and Fire Protection, complied with NRC requirements. The reports also stated that the programs needed to be defined. In fact, the audited programs are not sufficiently defined so as to be auditable as required by the NRC. These unaudited safety related programs give cause for great concern for the safety of the nuclear plant.

3. Florida Power's license requirements with the NRC require it to meet the Technical Specifications (TS) for the nuclear plant. Florida Power has not adequately defined and does not know the exact requirements of the Technical Specifications for the nuclear plant, therefore, Florida Power cannot accurately report that it is complying with the TS, and it is impossible to audit the TS program. This is a serious nuclear safety concern.

4. The NRC requires that Florida Power not include mandatory instructions in uncontrolled manuals used by nuclear operations (ANSI Standard N45.2.10-1973). This is because uncontrolled manuals may be outdated, causing personnel to implement the wrong procedure. Florida Power's Plant Review Committee Guidelines Manual, an uncontrolled manual, includes mandatory instructions for nuclear operations. This is a serious nuclear safety concern.

5. The January 1991 OPS Audit identified problems with instrument calibration at the nuclear plant. Florida Power had recently adopted a program to remove the instrument calibration stickers from the plants instruments. The stickers were the only place to obtain current information on the instruments. In implementing this program, no verification of calibration was performed, therefore, there is no assurance these safety related instruments are in calibration as required by the NRC. When this problem was identified, audit management and the nuclear plant management told the audit team to forget the issue. This is a serious nuclear safety concern.

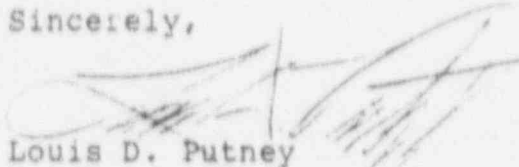
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Mr. Wollesen maintains that these safety concerns can be substantiated through plant records, interviews with audit team members on site, and through interviews with specific personnel familiar with these topics. In fact, the NRC has recognized some of these deficiencies for years, but has failed to act to correct them. These deficiencies at the nuclear plant render the Quality Assurance Program, Fire Protection Program, and other programs critical to nuclear safety ineffective resulting in a potentially catastrophic situation. The NRC's failure to date to take effective action to correct this dangerous situation is inexcusable.

Specifically, in the course of the NRC's proceedings pursuant to 10 CFR § 2.202, it is requested that the NRC thoroughly investigate my client's allegations and, upon a determination that the allegations are founded, suspend or revoke Florida Power's operating license until such time as these serious safety deficiencies are corrected.

The NRC is requested to act quickly and decisively to protect public safety and the environment as a whole in accordance with it's Congressional mandate.

Sincerely,

  
Louis D. Putney

LDP/sj

Enclosure(s)

cc: U.S. Nuclear Regulatory Commission,  
Office of Inspection and Enforcement  
The Honorable D. Robert Graham  
The Honorable Connie Mack  
The Honorable Michael Bilirakis  
The Honorable Sam M. Gibbons  
The Honorable Clifford B. Stearns  
The Honorable C. W. Bill Young  
The Honorable Lawton Chiles  
The Honorable David J. Fischer  
The Honorable Sandra W. Freedman  
The Honorable Curtis A. Rich, Sr.  
Nuclear Information & Resource Service  
Public Citizen  
Union of Concerned Scientists  
Board of Directors, Florida Progress Corporation