Florida Power
CORPORATION

Crystal River Unit 3
Docket No. 50-302

February 19, 1992

3F0292-10

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

Reference: 1) NRC letter to FPC dated January 29, 1992
Notice of Violation - Inspection Report 91-24

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

EEF:mag

Enclosure

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

IE01
1/1

FLORIDA POWER CORPORATION
INSPECTION REPORT 91-24
REPLY TO NOTICE OF VIOLATION

VIOLATION 91-24-01

a. Technical Specification 4.3.1.1 requires each reactor protection system instrumentation channel to be demonstrated operable by the performance of a channel functional test during the modes and at the frequencies shown in Table 4.3-1. Table 4.3-1 requires the anticipatory reactor trips on main turbine trip and loss of both main feedwater pumps to be operable in mode 1, power operation. TS 4.0.4 requires that entry into an operational mode shall not be made unless the surveillance requirements associated with the Limiting Condition for Operation have been performed within the stated surveillance interval.

Contrary to the above, at 5:00 p.m. on November 24, 1991, the plant entered mode 1, power operation, while the surveillance requirements associated with the anticipatory reactor trips had not been performed with the required surveillance interval. The plant continued operation in that mode with the surveillance requirements not met for about 24 hours until an unplanned reactor trip occurred at 5:20 p.m. on November 25, 1991.

This is a Severity Level IV Violation (Supplement 1).

FLORIDA POWER CORPORATION RESPONSE

Admission or Denial of Alleged Violation

Florida Power Corporation (FPC) accepts the violation.

Reason for Violation

The violation was caused by personnel error. During plant startup, the nuclear shift supervisor asked the Instrument and Controls (I&C) supervisor if the monthly surveillance was current. The I&C supervisor, thinking that the required surveillance was up to date, incorrectly advised the nuclear shift supervisor that the surveillance was current. The I&C supervisor did not verify the actual status of the surveillance. Based on this information, the nuclear shift supervisor continued with plant startup and entered mode 1.

Corrective Actions

Upon discovery that the surveillance had not been performed, the I&C supervisor notified the nuclear shift supervisor and the surveillance was performed. Results of the subsequent performance indicated that the affected instrumentation was within specifications and operable and, therefore, capable of performing required functions.

Date of Full Compliance

Full compliance was achieved on November 26, 1991 when the required surveillance was performed and it was determined that affected instrumentation was within specifications, operable, and capable of performing required functions.

Actions Taken to Prevent Recurrence

The following actions have been completed to further address this concern.

1. SP-440, Unit Startup Surveillance Plan, and SP-441, Unit Shutdown Surveillance Plan, have been revised to require the status of surveillances to be presented to the nuclear shift supervisor in person and to require a sign-off by the responsible shop supervisor to verify that surveillance requirements have been completed satisfactorily.

2. Shop supervisors have been briefed concerning the above referenced procedure changes and their responsibility to verify assigned surveillances are completed as required or are up to date.

VIOLATION 91-24-02

b. Technical Specification 6.8.1.6 requires that written procedures shall be implemented for refueling operations.

   Contrary to the above, Refueling Procedure FP-412, Canal Seal Plate Removal and Storage, was not properly implemented in that section 4.1 was not completed. This resulted in the canal seal plate being left in the sealed position instead of the storage position. The seal plate in the sealed position during power operation contributed to a higher than normal cavity temperature which, in turn, contributed to nuclear instrumentation failures. Work request NU 0286116, which involved FP-412, was signed off on November 12, 1991, as complete even though FP-412 was not fully accomplished. There was no specific verification required for section 4.1 in FP-412.

This is a Severity Level IV Violation (Supplement 1).

FLORIDA POWER CORPORATION RESPONSE

Admission or Denial of Alleged Violation

Florida Power Corporation (FPC) accepts the violation.

Reason for Violation

The reason for the violation was personnel error and inadequate procedure.

The canal seal plate work was performed by a work crew of B&W personnel under long term contract to FPC. As part of the pre-job briefing, which was conducted to discuss the canal seal plate work, instructions were given by the work supervisor to place the canal seal plate in the proper stored or operate position. The instructions were misunderstood by the workers and resulted in the

canal seal plate being left in the improper position. The canal seal plate work was discussed between the work supervisor and the workers who had performed the repositioning of the canal seal plate. The workers advised that the task had been performed satisfactorily. The work supervisor failed to physically verify the work prior to signing off the work request. FP-412, Canal Seal Plate Removal and Storage, was inadequate in that it did not contain a specific sign-off step to verify the canal seal plate is in the storage position.

Corrective Actions

The canal seal plate was placed in the proper stored position in accordance with FP-412. A Human Performance Evaluation System (HPES) evaluation was conducted for this event to identify and document the root and contributing causes. SP-324, Containment Inspection, has been revised to require verification of the correct canal seal plate storage by operations personnel prior to start up.

Date of Full Compliance

Full compliance was achieved on December 3, 1991 when the canal seal plate was placed in its proper stored position as required by FP-412.

Actions Taken to Prevent Recurrence

The following actions will be taken to further address this concern.

1. FP-412, Canal Seal Plate Removal And Storage, will be reviewed for human factors enhancements and a revision will be made to include a specific sign-off step for canal seal plate storage. This will be complete by March 30, 1992

2. B&W personnel will be retrained on work package sign-off requirements, with emphasis on the level of verification which must be accomplished prior to signing the work package as complete. In accordance with contract agreement, B&W personnel receive training regarding applicable CR-3 procedures and practices prior to the start of scheduled outage work activities. The above referenced verification and work package sign-off training will be incorporated into the normal training of B&W personnel prior to commencing work for Refuel 8.