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**Florida
Power**
CORPORATION

May 18, 1984
3F0584-07

Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 84-09

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

Patsy Y. Baynard
Assistant to Vice President
Nuclear Operations

AEF/ddl

Attachment

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**FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 84-09**

DEVIATION 84-09-02

Final Safety Analysis Report (FSAR) Section 9.7.2.1.g describes the operation of the control room emergency ventilation system and specifies that administrative controls "...to start this system within approximately ten minutes and to manually de-energize failed units and start standby units is satisfactory." These administrative controls are required to secure the normal running fans and start the emergency fans to provide flow through the emergency filter banks during an Engineered Safeguards System (ESS) actuation.

Contrary to the above, abnormal procedure AP-580 which provides administrative controls for an ESS actuation, does not direct securing of the normal running fans and starting of the emergency fans.

FLORIDA POWER CORPORATION POSITION

Florida Power Corporation disagrees with the stated deviation.

It is our position that AP-380 (the Inspection Report contains a typographical error of AP-580), "Engineered Safeguards System Actuation" is correct as written. Florida Power Corporation's position on FSAR Section 9.7.2.1.g is that it does not state or imply that the control complex emergency fans and filter units should be placed in service at any time, except following an actuation of RMA-5. As noted in the NRC Inspection Report, AP-245 provides for placing the emergency fans and filter units in service following RMA-5 actuation.

FSAR section 9.7.2.1.g states that "(u)pon receipt of an Engineered Safeguards (ES) signal the system dampers automatically switch to the recirculation mode". There is no requirement to switch to the emergency fans as a result of this action. The FSAR further states that "(u)pon receipt of a high radiation signal, RM-A5, or upon failure of the monitoring system sample pump or motor, the fans are tripped and the emergency fans are manually started". "It is not essential that the emergency system be started immediately and an administrative procedure to start this system within approximately ten minutes.... is satisfactory". This action is assured by AP-245.

Therefore, there are three modes of operation for the Control Complex ventilation system:

1. Normal operation - AHF-7A or AHF-7B running, AHD-1 and AHD-2 open, AHD-3 partially open.
2. Recirculation following ES actuation - AHF-7A or AHF-7B running, AHD-1 and AHD-2 closed, AHD-3 open.
3. Recirculation following RMA-5 actuation - AHF-18A or AHF-18B running, AHD-1 and AHD-2 closed, AHD-3 open.

VIOLATION 84-09-05

10 CFR Part 50, Appendix B, Criterion 12 requires instrumentation that affects quality to be calibrated at specific periods to maintain accuracy.

Section 1.7.1.12 of the Florida Power Corporation (FPC) Quality Program implements the requirements of 10 CFR Part 50, Appendix B, Criterion 12 and specifies that procedures to control calibration of instrumentation used in the measurement and monitoring of safety-related systems have been established and implemented.

Surveillance Procedure SP-317 provides the instructions for performing an RCS leakage check and specifies the instrumentation that may be utilized to perform the check. Two of the instruments specified for use are computer points R-731 (which measures average RCS temperature, Tave) and P-714 (which measures reactor power).

Contrary to the above, as of March 22, 1984, computer points R-731 and P-714, that were being used to determine RCS leakage, were not calibrated.

This is a Severity Level IV violation (Supplement I).

FLORIDA POWER CORPORATION POSITION

Florida Power Corporation agrees with the stated violation in that not all the inputs to the two computer points (R-731 and P-714) were calibrated.

APPARENT CAUSE

Florida Power Corporation considers this an administrative oversight.

CORRECTIVE ACTION

As stated in the Inspection Report, SP-317 was reperformed using other calibrated instrumentation, and the RCS leakage was determined to be within specification. In addition, the inputs to the subject computer points were calibrated and verified to be within tolerance.

CORRECTIVE ACTION TO PREVENT RECURRENCE

The inputs to the subject computer points will be added to the proper existing calibration procedure.

DATE OF FULL COMPLIANCE

Full compliance will be achieved by July 31, 1984.

VIOLATION 84-09-06

Technical Specification 4.7.7.1.c.4 requires verification of the control room emergency ventilation system flow rate during system operation in the emergency recirculation mode.

Contrary to the above, as of March 15, 1984, the control room emergency ventilation system flow rate had not been verified during operation in the emergency recirculation mode.

This is a Severity Level IV violation (Supplement I).

FLORIDA POWER CORPORATION POSITION

Florida Power Corporation disagrees with the stated violation.

Technical Specification 4.7.7.1.c.4 requires flow rate of 43,500 CFM \pm 10% during testing, but does not state that testing must be performed in the emergency recirculation mode as stated in the violation. The control room emergency ventilation system is a variable flow rate system depending on operator action. As stated in the Inspection Report, Florida Power Corporation performed a flow rate test in the emergency recirculation mode and determined that the system was within specification. In addition, the surveillance procedure was revised to require verification of ventilation damper position which reflects conditions required for emergency recirculation conditions. The procedure was performed on May 1, 1984 and proper flow rate in the emergency recirculation mode was verified. No further action is being planned.

VIOLATION 84-09-04

Technical Specification 6.8.1.c requires adherence to procedures involving surveillance and test activities. Surveillance procedure SP-317 provides the instructions for performing a Reactor Coolant System (RCS) leakage check. Procedure steps 6.4.1 through 6.4.3 require data to be recorded on Enclosures 1 and 2 at the end of the data collection interval consisting of at least eight hours of steady state operation. The procedure then requires that the data from Enclosure 1 and Enclosure 2 provide input for the RCS leakage calculation performed on data sheet Enclosure 3.

Contrary to the above, on March 6, 1984, data from Enclosure 1, completed at approximately 1:00 p.m. and representing only six hours of steady state operation, was used to compute the RCS leakage with data from Enclosure 2 that was completed at 4:00 p.m. The Enclosure 2 data represented eight hours of steady state operation.

This is a Severity Level IV violation (Supplement I).

FLORIDA POWER CORPORATION POSITION

Florida Power Corporation disagrees with the stated violation on SP-317. It is FPC's contention that all the data recorded for SP-317 on 03/06/84 from 0500 thru 1600 represents the plant at steady state conditions. All the prerequisites for steady state conditions, as required per SP-317 section 4.1 thru 4.8, were met except for 4.2.e which suggests that deboration not be conducted during leak rate determinations. There were two reasons for the deboration. First, the total RCS leakage of 1.6 gpm required the operators to add 700 gallons to the makeup tank to keep the level within the normal operating range as required per step 4.4.1.b. Second, the primary leakage was thru RCV-8 (pressurizer safety valve). The water leaving the pressurizer was a low boron concentration (160 ppmb) which was significantly lower than RCS boron concentration (722 ppmb). This caused a constant boration of the RCS. Constant borating of the RCS would make the control rods move out. The operators had to add small additions of slightly borated water to the makeup tank to maintain reactivity balance and to prevent major rod movements. This was consistent with the recommendations of the Reactor Specialist.

The leakage out of the RCS and the water addition during this period of time was not a transient condition but very stable as noted by the hourly Makeup Tank (MUT) decrease. At the end of the 8 hour period, it was noted that the hourly averages of leakage out of the

MUT decreased during the hours that additions were made to the MUT. It was decided at that time to continue the MUT Data (Enclosure 2) for two more hours. If the data for the makeup tank (Enclosure 2) had been based on the eight hours between 0500 and 1300 of steady state operation, the hourly average leakage would have been less conservative because of the low readings taken at 0900 and 1200 due to additions to the makeup tank. Additions to the makeup tank do not mean the plant is in an unstable condition. To ensure that the six data readings taken when additions were not made were representative of the hourly average, two more hourly averages were taken and used to compute the leakage.

Since the data collected for the RC Drain Tank (Enclosure 1) is not affected by additions to the makeup tank, eight hours of steady operation was also represented for Enclosure 1. If there was an unlikely increase in RCS leakage into the RC drain tank during the additional 2 hours of data it would have shown up as an increase in the Enclosure 2 readings and would have made the unidentified leakage more conservative (higher than actual).