October 16, 1995

Florida Power Corporation
Crystal River Energy Complex
Mr. P. M. Beard, Jr. (SA2A)
Sr. VP, Nuclear Operations
ATTN: Mgr., Nuclear Licensing
15760 West Power Line Street
Crystal River, FL 34428-6708

SUBJECT: MEETING SUMMARY - CORRECTIVE ACTION PLAN
CRYSTAL RIVER 3 - DOCKET NO. 50-302

Gentlemen:

This refers to the meeting conducted at our request at the Crystal River nuclear facility in Crystal River, Florida, on October 13, 1995. The purpose of the meeting was to discuss the status of your Corrective Action Plan for Crystal River 3. It is our opinion that this meeting was beneficial.

A list of attendees is provided in Enclosure 1 and the material you presented is provided in Enclosure 2. The agenda included discussions on the following topics: Safety Culture/Event Free Operations; Engineering Interfaces and Support; Regulatory Performance; and Operability Determinations. The NRC staff expressed a need for a higher level licensee document to proceduralize the self-assessment initiatives that were discussed at the meeting.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10 Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

Orig signed by Kerry D. Landis

Kerry D. Landis, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Docket No. 50-302
License No. DPR-72

Enclosures: 1. List of Attendees
2. FPC Presentation

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cc w/encls:
Gary L. Boldt, Vice President
Nuclear Production (SA2C)
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B. J. Hickle, Director
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L. C. Kelley, Director (SA2A)
Nuclear Operations Site Support
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Tallahassee, FL 32399-2100

cc w/encls cont'd: See page 3

cc w/ encls cont'd:
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Board of County Commissioners
Citrus County
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Rockville, MD 20852-1631

Distribution w/encl:
K. Landis, RII
L. Raghavan, NRR
G. A. Hallstrom, RII
PUBLIC

NRC Resident Inspector
U.S. Nuclear Regulatory Commission
6745 N. Tallahassee Road
Crystal River, FL 34428

SEND TO PUBLIC DOCUMENT ROOM? YES NO						
OFFICE	RII					
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COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\CRMTGSUM.013

LIST OF ATTENDEES

Florida Power Corporation

P. Beard, Senior Vice President, Nuclear Operations
G. Boldt, Vice President, Nuclear Production
W. Conklin, Director, Materials and Controls
B. Gutherman, Licensing Manager
B. Hickle, Director, Nuclear Plant Operations
M. Jacobs, Company Spokesman
L. Kelley, Director, Nuclear Operations Site Support
P. McKee, Director, Quality Programs
S. Robinson, Manager, Nuclear Quality Assurance
P. Tanguay, Director, Nuclear Engineering and Projects

Nuclear Regulatory Commission

R. Butcher, Senior Resident Inspector, Crystal River
C. Casto, Chief, Engineering Branch, Division of Reactor Safety, Region II (RII)
K. Clark, Public Affairs Officer, RII
T. Cooper, Resident Inspector, Crystal River
S. Ebneter, Regional Administrator, RII
K. Landis, Acting Chief, Reactor Projects Branch 2, Division of Reactor Projects (DRP), RII
F. Miraglia, Deputy Director, Office of Nuclear Reactor Regulation (NRR)
E. Merschoff, Director, DRP, RII
L. Raghavan, Project Manager, NRR

Public

D. Solov, Reporter, Tampa Tribune
R. Weiss

ENCLOSURE 1

NRC/FPC

MANAGEMENT MEETING

October 13, 1995

Enclosure 2

Table of Contents

NRC/FPC Management Meeting
October 13, 1995
Agenda

I. Introduction - P. M. Beard

II. Safety Culture/Event Free Operations - B. J. Hickle

III. Engineering Interfaces and Support - P. R. Tanguay

IV. Regulatory Performance - L. C. Kelley

V. Summary - G. L. Boldt

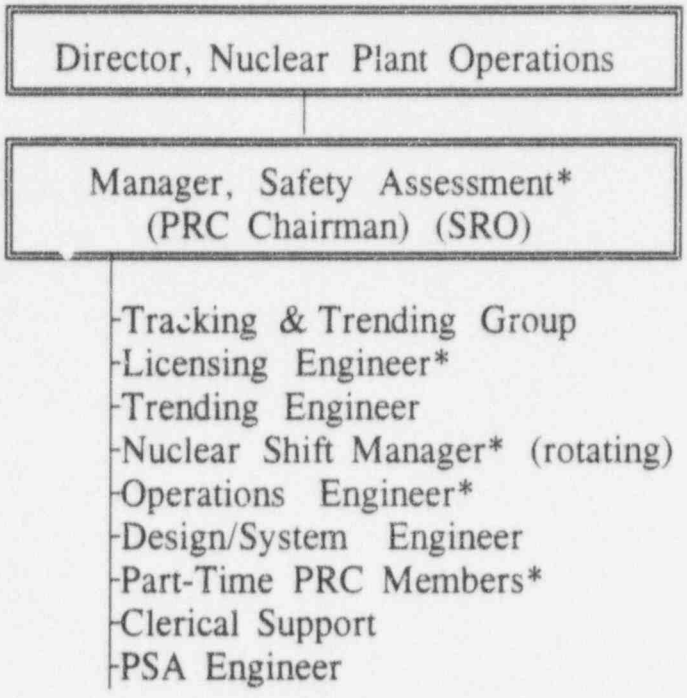
Florida Power Corporation Participants:

Percy M. Beard, Jr. - Senior Vice President, Nuclear Operations
Gary L. Boldt - Vice President, Nuclear Production
Bruce J. Hickle - Director, Nuclear Plant Operations
Larry C. Kelley - Director, Nuclear Operations Site Support
Paul R. Tanguay - Director, Nuclear Engineering and Projects

Nuclear Regulatory Commission Participants:

Frank J. Miraglia, Jr. - Deputy Director, Office of Nuclear Reactor Regulation
Stewart D. Ebneter - Region II Administrator
Ellis W. Merschoff - Director, Reactor Projects
L. Raghavan - Crystal River Unit 3 Project Manager
Kerry D. Landis - Chief, Reactor Projects Branch 3
Ross C. Butcher - Crystal River Unit 3 Senior Resident Inspector

SAFETY ASSESSMENT TEAM
Organization (Conceptual)



*Denotes PRC membership

Responsibilities

PRC affairs
Corrective action system process administration
Operating experience program
Monthly and quarterly performance trends
Facilitation of management self-assessments
Precursor and problem report data reduction and analysis
Review of corrective actions
Review of PSAs, operability evaluations, LERs
Facilitation of root cause evaluations
Promotional programs
Overview of event-free operations program effectiveness
Integrated tracking system administration
Assistance to line management as needed

Implementation Date

December 1995

SAFETY ASSESSMENT PERFORMANCE IMPROVEMENT TARGETS

PRC - Further increase depth and scope of reviews

Corrective Actions - Consistently preclude problem recurrence and identify generic issues

Operating Experience - Develop effective recall mechanism and integrate into work schedules

Performance Trends - Develop capability to identify lower level precursor trends

Event-Free Operations - Provide real-time overview of program

Communications - Develop more effective promotional tools

Tracking - Implement single user-friendly action tracking system

PSA - Identify enhanced applications

Root Cause - Widen application and improve process

Resource Management - Efficiently integrate safety assessment resources

EVENT-FREE OPERATIONS AREAS OF FOCUS

STAR and Questioning Attitude

Communications Between Groups

Human Performance Trending

Root Cause Evaluations

Operability Determinations

Integration of Safety Assessment Activities

ENGINEERING INTERFACES & SUPPORT

REQUESTS FOR ENGINEERING ASSISTANCE (REA)

- MANAGER LEVEL REVIEW OF ALL BACKLOGGED REA's
- ITEMS ADDRESSED DURING THE MONTHLY MULTI-DEPARTMENTAL PRIORITY MEETINGS OF ENGINEERING ACTIVITIES
- OTHER ENHANCEMENTS ARE BEING CONSIDERED
  - * WEEKLY REVIEW OF NEW REAs BY ENGINEERING MANAGEMENT
  - * ORGANIZATIONAL CHANGES ARE BEING EVALUATED TO ENHANCE OUR ABILITY TO BE MORE RESPONSIVE TO QUICK TURN AROUND ACTIVITIES

EVENT FREE OPERATION PROGRAM IMPLEMENTATION

- PRECURSOR CARD CAUSE CODES HAVE BEEN DEVELOPED
- TRENDING OF CAUSE CODES WILL BE PERFORMED AT SUPERVISORY LEVEL

ENGINEERING INTERFACES & SUPPORT (cont'd)

INTERDEPARTMENTAL COMMUNICATIONS

- CONTINUES TO BE AN AREA OF FOCUS
- EFFORTS TAKEN TO-DATE APPEAR TO BE WORKING WELL
  - * OPERABILITY REVIEWS (CFV-1,3)
  - * DESIGN ENGINEERING REVIEW BOARD
  - * INTEGRATED PROJECT TEAMS
  - * CHANGES TO THE CALCULATION AND OPERATION'S PROCEDURE REVIEW PROCESS
  - * SYSTEM OUTAGE PLANNING AND COORDINATION ACTIVITIES
- CONTINUING TO STRESS ITS IMPORTANCE AND LOOK FOR OPPORTUNITIES TO FURTHER IMPROVE IT

REGULATORY PERFORMANCE

- Improving Credibility with the NRC
- Communication Plan
- Scheduling Coordination of Licensing Action/ Regulatory Action
- Internal Awareness of Licensing/Regulatory Action
- Improving Quality of Communication (Status)

FPC/NRC ISSUES NEEDING NRC APPROVAL/FEEDBACK

October 11, 1995

Issues not yet submitted to the NRC for Refuel 10

10R Tendon Relief	Letter requesting deferral of inspection of eight deferred tendons to 11R in management review. Expect to issue letter early week of 10/16.
RCP Flywheel Inspection	LVC to meet with Rags 10/17 regarding specifics of how to eliminate the surface inspection for 10R. Commitment to Reg. Guide in ITS may require tech. spec. change or re-interpretation of RG. Working with other plants to see if the inspections can be done easily.
Criticality Monitor	No exemption to Part 50 in our license. Awaiting feedback from NRC. Open PR needs to be closed before fuel receipt.

Issues submitted for Refuel 10 but not yet approved by NRC

ILRT Exemption	Exemption received. Rule change approved.
OTSG Inspection	Informal copy of RAI received. NRR holding original until he hears from FPC as to time needed to respond. RAI has over 40 questions. A meeting will likely be needed to iron out all technical issues. This may require significant management involvement due to competing related issues. NRR scheduled for 12/31/95.
Biometrics	Exemption request submitted. FPC needs to speak to NRR reviewer. NRR scheduled for 12/31/95.
18-24 Month Surveillance	Telecon with comments from technical reviewers held 10/10/95. Need to respond to questions. CREVS setpoint and RPS/EFIC setpoint descriptions segregated from this SER (different branch reviews these).
Spent Fuel Storage TS	Responded to NRC RAI. No major issues. NRR schedule is 12/31/95.
Pressurizer Flaw Evaluation	Have decided to make every effort to perform enhanced NDE in 10R. Also preparing for contingencies. NRC review of analysis is not complete. We will ask to not do NDE in 11R if 10R efforts are successful. NRR schedule is 11/30/95.
Core Flood Valve 4	Check valve relief to not inspect until 12R. Inspected in 9R in lieu of 10R. Relief requested 8/17/95.
Reactor Vessel Inspection	Current Code requirements backfit by 1992 rulemaking requires 100% inspection of a weld we cannot reach. Relief requested 9/22/95.
Core Flood Nozzle	BWOG has been working on qualifying technique for more efficient inspection (from ID) of nozzle region for a long time. Generic work has been completed. We have assured plant-specific attributes. Relief requested 9/22/95.
Class III Hydros	Code case which will reduce the impact of such hydros significantly is being reviewed by NRC (RG 1.147). This is not yet

	approved, therefore we need plant-specific relief. Relief requested 9/22/95.
Calibration Blocks	Relief needed to use flat calibration blocks for large diameter piping. Relief requested 9/22/95.

Other Issues not yet submitted to NRC

CREVS Tech Spec	Submitted model TS to BWOG and other Owners Groups for inclusion in model ITS.
ASME Code Update	A generic issue. NRC would like all plants to update to one Code edition. Phyllis Dixon is on the NEI task force. Our plans are to update ISI requirements but we are likely to pursue IST relief.
Appendix R Exemptions	There will be approximately three new exemptions and two revised exemptions filed for acceptance of existing Thermo-Lag barriers. two other existing exemptions will be deleted. One new and six revised deviations will be necessary but these do not require NRC approval. Exemption for RB radiant energy shields through BG/LCK review. Need to issue before 10/19 meeting at NRR.
IPEEE	Have extended submittal date to 6/30/96. Will include fire. Do not plan to include wind and flood. Seismic to be covered by A-46 program.
LTOPS	NRC has denied the 1989 LTOPS submittal. Complicated by our use of non-standard (non-Appendix G) analysis. Need an action plan. Currently have procedures in place in anticipation of approval of this study. NRR wants a summary of our plan of action (conference call).

Other issues submitted but not yet approved by NRC

Power Level Upgrade	Determined that it would be inappropriate to try to implement this prior to 10R. NRC was shooting for September 30 issuance with a 60 day implementation period. Being actively worked toward closure. We have asked the NRC to determine if issuance or implementation should be deferred.
Mecatiss Tests	A report on the tests was docketed, and the NRC responded with specific questions that we answered. Additional information was sent as an attachment to our last RAI. NRC not planning to approve those tests. If we choose Darmatt for our UL tests we may not want to pursue this approval. If we choose Mecatiss there is an important configuration that was tested in France that is not being tested at UL. We would need to have that specific configuration approved.
UL Fire Tests	NRC has reviewed our test plan and provided some verbal comments and questions. An important issue in fire endurance testing is what additional configurations are bounded by the specific configuration that was tested. Our test report described the configurations that we considered to be bounded. This was one area where the NRC had comments. Additional justification will be required for acceptance of our bounding determination.
Ampacity Tests	We provided answers to two questions on fire barrier ampacity derating tests. These were: testing under an Appendix B program and testing steel tray and conduit according to the Standard vs testing aluminum as is in the plant. We have no specific feedback.
A-46 Seismic Qualification	Plant-specific walkdown procedure submitted in 1992. Walkdowns largely complete. Some RB items still need to be walked down. Third party review complete. Schedule for report to NRC is 12/31/95. Report will include follow-on work. NRR may inspect in 1996.

Individual Plant Exa..ination	NRR will send Request for Additional Information. Will answer some questions in 60 days and give schedule for the remainder. Schedule may be late 1996 or 1997 as IPEEE is due 6/30/96 and resources are the same.

Licensing Status Log

11-Oct-95

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
LER 95-017-00	Frijouf	CHV-68 or CHV-69 fail open. References Problem Report 95-0171.	10-Oct-95	BJH	[10/13/95] 10/11/95: submittal currently in management review. (3F1095-03)	LIC
Generic Letter 95-07: Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves (3N0895-10)	Powell	1. Perform screening evlauation of the operational configurations of all safety-related power-operated gate valves to identify those v..lves that are potentially susceptible to pressure locking or thermal binding. 2. Document a basis for the operability of the potentially susceptible valves or, where operability cannot be supported, take action in accordance with CR-3 ITS.	13-Oct-95	PMB	[10/16/95] 10/11/95: submittal currently in management review. (3F1095-01)	LIC
EOP Enhancements	Becker Fleming	Submittal to inform the NRC of FPC's current and near-term activities regarding EOP's	20-Oct-95	PMB	10/11/95: B&W will be contacted and requested to pick up certain generic EOP issues. Letter to the NRC will be submitted following B&W contact. (3F1095-05)	OPS/LIC

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
LER 95-018-00	Frijouf	Inadequate ITS notes for surveillance requirement 3.3.7.1. References Problem Report 95-0183.	20-Oct-95	BJH	[10/23/95] 10/11/95: information being collated for draft review. (3F1095-11)	LIC
LER 95-020-00	Frijouf	Leak in SW piping associated with reactor building fans. References Problem Report 95-0187.	24-Oct-95	BJH	[10/27/95] 10/11/95: information being collated for draft review. (3F1095-16)	LIC
LER 95-019-00	Frijouf	MSV-130 & MSV-148 isolation. References Problem Report 95-0184.	24-Oct-95	BJH	[10/27/95] 10/11/95: information being collated for draft review. (3F1095-12)	LIC
Changes in Main Control Room Dose Assumptions	Tunstill	Submittal will advise the NRC that FPC is changing certain assumptions used in evaluating the radiation dose to the CR-3 main control room operators during design basis accidents.	27-Oct-95	PMB	[10/31/95] 10/11/95: submittal currently in management review. (3F1095-04)	LIC

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Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
RCP Flywheels	Cecilia	Submittal will be made to not perform surface examination. FPC will attend Westinghouse Owners Group/NRC meeting regarding flywheels scheduled for October 17, 1995. Based on the outcome of this meeting, FPC will submit appropriate correspondence.	27-Oct-95	PMB	10/11/95: submittal currently in draft form. (3F1095-07)	LIC
Refuel 10 Tendon Relief Request	Cecilia Lese	Awaiting Engineering input regarding pitting/corrosion issues associated with tendon work during Refuel 10.	27-Oct-95	PMB	10/11/95: submittal currently in management review. (3F1095-06)	LIC
LER 95-021-00	Frijouf	Accident mitigation strategy relies on non-safety related equipment. References Problem Report 95-0189.	27-Oct-95	BJH	[10/30/95] 10/11/95: information being collated for draft review. (3F1095-17)	LIC
Material Status Report	O'Shea	Licensee authorized to possess special nuclear material in a quantity totaling more than 350 grams of contained Uranium-235, Uranium-233 or plutonium shall complete and submit mateial balance reports. This report is due semi-annually.	27-Oct-95	DMO	[10/31/95] 10/11/95: information currently being reviewed and collated. (3F1095-13)	NFM

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
Revised Operator Actions for Postulated Sulfur Dioxide Tank Rupture	Tunstill	Advise NRC that immediate actions of AP-513 (donning SCBA's immediately) will not take place.	27-Oct-95	PMB	10/11/95: draft submittal currently in management review. (3F1095-09)	LIC
Appendix R Exemption Request: Reactor Containment Building	Powell Rossfeld	FPC requests an exemption from Section III.G.2 of 10 CFR 50, Appendix R. Analysis provided in submittal demonstrates that the combination of existing conditions and fire protection features provides adequate protection of the public health and safety.	31-Oct-95	PMB	10/11/95: submittal currently in management review. (3F1095-15)	NSS
Generic Letter 92-01, Revision 1, Supplement 1: Reactor Vessel Structural Integrity (3N0595-09)	Bright Fleming	Provide (1) assessment of any change in best-estimate chemistry; (2) determination of the need for use of the ratio procedure in accordance with the established Position 2.1 of RG 1.99, Rev. 2; and (3) results of any necessary revision to the evaluation of RPV integrity and certification that previous submitted evaluations remain valid.	01-Nov-95	GLB	[11/19/95] 10/11/95: this response will be submitted to the NRC by the B&W Owners Group with FPC concurrence. (3F1195-01)	LIC
LER 95-022-00	Frijouf	DC Piping, support and nozzle qualification concerns. References Problem Report 95-0192.	01-Nov-95	BJH	10/11/95: information currently being collated. (3F1195-03)	LIC

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
Monthly Operating Report	Frando	October 1995 report submitted in accordance with TS 5.7.1.2.	12-Nov-95	GLB	[11/15/95] Report will be submitted to Licensing for verification and management review at the beginning of November. (3F1195-02)	LIC
Plant Performance Review (3N1095-05)	McLaughlin Fleming	Upcoming NRC inspection beginning 11/13/95 lasting one week with two NRC inspectors on site. Inspection Scope: Licensed Operator Requalification Program Evaluation. This is a Core Inspection that will also inspect corrective actions to improve EOPs.	13-Nov-95	N/A	N/A	NOT
Plant Performance Review (3N1095-05)	McLaughlin Fuller/Wilder	Upcoming NRC inspection beginning 11/27/95 lasting one week with one NRC inspector on site. Inspection Scope: Core Inspection on Chemistry and Solid Radioactive Waste Management.	27-Nov-95	N/A	N/A	CHEMRAD

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
Plant Performance Review (3N1095-05)	McLaughlin Friend/Tunstill	Upcoming NRC inspection beginning 12/04/95 lasting one week with three NRC inspectors on site. Inspection Scope: Corrective Actions for Violations and Deviations and Service Water Operational Performance Assessment. This is a special inspection on setpoint corrective actions and actions taken to improve the service water system.	04-Dec-95	N/A	N/A	ENG
Plant Performance Review (3N1095-05)	McLaughlin	Upcoming NRC inspection beginning 1/08/96 lasting one week with three NRC inspectors on site. Inspection Scope: Safety Assessment Corrective Action Program. This is a regional initiative inspection to review the adequacy and status of the ongoing Safety Assessment and Corrective Action Program at Crystal River.	08-Jan-96	N/A	N/A	LIC

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Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
Generic Letter 95-07: Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves (3N0895-10)	Powell	1. Evaluate the operational configurations of safety-related power-operated gate valves to identify valves that are susceptable to pressure locking or thermal binding. 2. Perform further analyses as appropriate, and take needed corrective actions to ensure that the susceptible valves identified in 1 are capable of performing their intended safety function (s) under all modes of plant operation, including test configuration.	01-Feb-96	PMB	[2/13/96] 10/11/95: information currently being reviewed and collated.	LIC
Plant Performance Review (3N1095-05)	McLaughlin Stephenson	Upcoming NRC inspection beginning 2/26/96 lasting one week with one NRC inspector on site. Inspection Scope: Core Inspection on the Operational Status of the Emergency Preparedness Program.	26-Feb-96	N/A	N/A	EP
Plant Performance Review (3N1095-05)	McLaughlin Rossfeld	Upcoming NRC inspection beginning 3/11/96 lasting one week with one NRC inspector on site. Inspection Scope: Core Inspection of the Fire Protection Program that will also inspect the RCP fire protection oil collection system.	11-Mar-96	N/A	N/A	NSS

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
Plant Performance Review (3N1095-05)	McLaughlin Fleming/Smith	Upcoming NRC visit beginning 3/11/96 lasting one week with three NRC inspectors on site. Visit Scope: Operator Exam Preparation.	11-Mar-96	N/A	N/A	NOT
Plant Performance Review (3N1095-05)	McLaughlin Cecilia/Dixon	Upcoming NRC inspection beginning 3/18/96 lasting one week with two NRC inspectors on site. Inspection Scope: Core Inspection of Inservice Inspection and regional initiative to look at surface flaw in the pressurizer surge line nozzle.	18-Mar-96	N/A	N/A	ISI
Plant Performance Review (3N1095-05)	McLaughlin Fleming/Smith	Upcoming NRC visit beginning 3/25/96 lasting one week with three NRC inspectors on site. Visit Scope: Initial Licensing Examination.	25-Mar-96	N/A	N/A	NOT
Plant Performance Review (3N1095-05)	McLaughlin Fuller/ Wilder	Upcoming NRC inspection beginning 3/25/95 lasting one week with two NRC inspectors on site. Inspection Scope: Core Inspection on Occupational Radiation Exposure, Chemistry and Solid Radioactive Waste Management.	25-Mar-96	N/A	N/A	CHEMRAD

Initiating Source	Responsible Person	Description	Due Date	Signature	Status	Action
Plant Performance Review (3N1095-05)	McLaughlin/Friend Longhouser	Upcoming NRC inspection beginning 4/08/96 lasting one week with one NRC inspector on site. Inspection Scope: Core Inspection on Physical Security Program for Power Reactors.	08-Apr-96	N/A	N/A	SEC

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ADDITIONAL MAKEUP TANK EVENT CORRECTIVE ACTIONS

- Actions identified as a result of FPC's investigation of possible misconduct related to the September 4, 1994 (second) MUT test

- 6 additional corrective actions identified (handout)

EXPECTATIONS FOR ISSUE MANAGERS

DO

1. Prepare, with management assistance, a clear, concise written statement defining what the issue is.

2. If applicable, (e.g., regulatory issue) assemble a complete reference listing of regulations, correspondence and other materials which define the regulatory and/or design basis. Be personally familiar with the content of these documents and be prepared to challenge whether or not actions and deliverables, intended to resolve the issue, meet the requirements of the reference documents.

3. Assemble a "living" action plan to address each action necessary to achieve issue resolution. Assure each action step is assigned to a single accountable person for completion with an action due date. Assure the action plan is published and updated frequently with a status on each action item. At least monthly, provide an updated schedule and percent completion for the total project.

4. Be personally and technically knowledgeable of the justification for each position taken by FPC to resolve individual action steps and the overall action plan.

5. Assure CP-150, CP-111, CP-144,are rigorously applied to any operability or reportability concerns.

6. Assemble an auditable file folder of evidence documenting completion for each action step in the overall action plan.

DON'T

1. Just be a "keeper of the list."

2. Accept information you do not personally understand, haven't questioned, or haven't seen documented evidence of.

3. Accept missed schedules without advising the issue sponsor.

4. Accept incomplete or poorly documented/justified positions.

SELF ASSESSMENT INTIATIVES

- Plant Review Committee (PRC) improvements
- Nuclear General Review Committee (NGRC) improvements
- Quarterly manager level assessments
- Semi-annual senior manager level assessments
- Management Review Panels (MRP)
  - Violations
  - Other significant issues (on request)
- Creation of a full time safety assessment team

BOLDT RESPONSE TO THE MRP REPORT

AS OF OCTOBER 12, 1995

CURRENT STATUS:			
	Complete with Documentation (or N/A).....	41	last report 41
	Complete, need Documentation.....	3	3
	Not Complete.....	5	5
		49	

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
	I. Initiate an aggressive effort to improve, from the top down, internal communication of the safety culture, including legal compliance aspects, of nuclear power operations.			
1	The Mission Statement was revised to place primary emphasis on nuclear safety.	Pat Beard/ Gary Boldt		COMPLETE Documents on File
2	The Long Range Plan identifies safety culture as the top priority and has established actions to go with it. This was also stressed in the 1995 plan.	Pat Beard/ Gary Boldt		COMPLETE Documents on File
3	Safety and conservative decision-making was emphasized by senior management at the "all hands" meetings in January. This will be continued in subsequent quarterly meetings. NRC COMMENTS (From Inspection Report 95-08) Residents attended the subject meetings. The importance of safe operation was emphasized to licensee personnel.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE ALL-HANDS MEETINGS ARE CONDUCTED QUARTERLY. THESE TOPICS WERE DISCUSSED IN THE 1/95 AND 4/95 MEETINGS.
4	A change was made to the plan of the day to remove the number of continuous days on line.	Brent Moore		COMPLETE Documents on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
5	The Plant Manager wrote a bulletin describing the nuclear safety and event free operations program which was distributed to all Nuclear Operations personnel. NRC COMMENTS (From Inspection Report 95-08) The residents attended the DNPO's briefing of personnel. This program will be implemented by each manager reporting to the DNPO. This program is a living program and will be enhanced as operating experience is gained. The residents have reviewed the draft Plant Operations specific program. The residents monitored operator simulator exercises and noted the event free operations program elements were incorporated during the monitoring and critiquing of operator performance.	Bruce Hickle		COMPLETE Documents on File
6	Specific presentations were made to "all hands" on the event free operations program. This program will be implemented by the departments reporting to the Plant Manager by April 1, 1995. Each supporting department will fully implement this program by July 1, 1995. NRC COMMENTS (From Inspection Report 95-08) Residents attended the subject meetings. The importance of safe operation was emphasized to licensee personnel and the new initiative the event free operations program was presented.	ALL DIRECTORS + Jerry Campbell, Brent Moore		COMPLETE Documents on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
7	Line management directed that future audits include an assessment of safety culture in the departments audited. Performance criteria for this portion of the assessment will be based on FPC management expectations developed, in part, from consideration of IAEA bulletin 75-INSAG-4. NRC COMMENTS (From Inspection Report 95-08) The residents have discussed the safety culture audit program with responsible supervisors. The review criteria, for the audits, was reviewed by the inspectors.	Paul McKee		COMPLETE. PROCESS IN PLACE. Audit 95-02-MAKP made some observations. Audits 95-03-SSUP and 95-04-CREW provided more intense analyses of hp/sc parameters.
8	A letter documenting FPC senior management commitment to (and role in achieving) conservative decision-making was sent from FPC (Allen Keesler) to INPO (Zack Pate).	Gary Boldt		COMPLETE Document on File
9	An event response checklist for the Nuclear Shift Manager to use in responding to and investigating significant plant events has been implemented. This approach is one of several initiatives intended to emphasize the lead role of line (especially plant) management in nuclear safety and legal compliance. NRC COMMENTS (From Inspection Report 95-08) The residents have reviewed the event response checklist and found it to have the potential to be a useful tool. The residents verified the NSMs were aware of the checklist and were prepared to use it when needed.	Bruce Hickle		COMPLETE Document on File Other initiatives include line management becoming more involved in personal safety by attending plant safety meetings and PRC establishing guidelines and goals to strengthen its role as a safety review committee.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
	II. Expand existing management procedural initiatives, including additional emphasis on procedure adherence. This should include efforts to improve ownership and the quality of procedure maintenance by users, making them more simple and usable. This should be done consistent with the communication of safety culture.			
10	Implementation of the event free operations program in all departments by July 1, 1995.	DUPLICATE ITEM TO # 6 WHICH APPLIES TO THIS AREA ALSO		COMPLETE. SEE ITEM # 6.
11	A formal business process improvement (BPI) evaluation will be performed on the procedure change process in 1995.	Bruce Hickle	6/96 (START)	IN PROGRESS Kimberly Bowman and Dale Stevens are the Core Team leaders. Some enhancements have been implemented. The formal BPI is now scheduled to start after the outage. Ref. cc:Mail from K.R. Bowman (in folder).
12	"All hands" meetings presented and discussed event free operations and procedure compliance policies.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE. SEE ITEM # 3
13	Procedure ownership is being transferred to end users on a trial basis (beginning in the I&C shop). The purpose of this effort is to enhance ownership and accountability among procedure users and to assure the level of procedure detail (or simplification) is commensurate with user needs. Such efforts, however, must maintain a proper balance of quality of technical input. Therefore, system engineering will remain a close partner in review and approval.	Bruce Hickle/ Ron Davis/ Jerry Campbell	12/31/95	IN PROGRESS The Manager, I & C Maintenance has been made the Interpretation Contact for procedures his shop performs. The next area of transfer will be the in the ISI section.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
14	A computer program (NUPOST) for recording and tracking procedure change recommendations was implemented. Operations led the development and implementation of this product.	Greg Halnon		COMPLETE System is operational. Contact is Earnie Gallion.
15	A training initiative to intentionally fault (or fail) a procedure during simulator exercises to verify that operators will use the procedure change process is being implemented.	Rolf Widell		COMPLETE Scenarios in each of the first two cycles of simulator requalification contained situations where procedures did not contain adequate guidance for correction of specific equipment problems. For each, MNPO policy regarding the use of 50.59 and 50.54 to determine appropriate corrective actions was developed and discussed. These types of activities will periodically occur during future requal. sessions.
16	When appropriate, new procedures and key changes to existing procedures are tested on the simulator.	Rolf Widell/ Jerry Campbell		COMPLETE. PROCESS IN PLACE. Examples include ITS required changes to SP-417 and loss of vital busses from 100% power. Also, simulator validation has been performed on EOP-7 and 8, SP-110, 113 and 130, and the new AP on Rapid Plant Shutdown.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
17	All I&C surveillance procedures are being re-validated by the I&C shop. NRC COMMENTS (From Inspection Report 95-08) The residents have discussed the review and re-validation of I&C surveillance procedures with I&C personnel. This effort could result in improved procedures with fewer events.	Bruce Hickle/ Ron Davis	11/17/95	IN PROGRESS An SP team has been established that will validate and re-write both SPs and PTs. Some SPs have been validated on the simulator. Note: the due date corresponds to the date committed in the Setpoint Action Plan presented to the NRC.
18	To simplify procedures and place more accountability on the performer and performing departments, some "hold points" have been replaced with "witness points" (second party verification), and some new witness points have been added.	Bruce Hickle	ONGOING	IN PROGRESS The task force has identified those discretionary hold points that will become second-party verifications, witness points, or just go away. Procedure revisions were dependent on approval of NOD-48, which was signed the week of 6/19/95. The final step in the process will be to revise existing procedures and make the changes to the affected hold points. Approximately 160 procedures are affected.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
19	To further clarify procedure intent and improve procedure usability, "independent verification" and "concurrent verification" have been re-defined (in CP115). NRC COMMENTS (From Inspection Report 95-08) The residents reviewed the change in definition in CP 115. The operations personnel were concerned at first that the revised definition would inhibit their ability to perform tagging under unique circumstances (such as in high radiation areas) where exposures to other hazards would dictate concurrent tagging. The provisions in CP 115 alleviated this concern.	Bruce Hickle		COMPLETE CP-115 on File
20	To improve line ownership of the problem report and precursor processes, program and procedure responsibility was moved from the QA director to the plant manager. NRC COMMENTS (From Inspection Report 95-08) As noted above, the plant manager has assumed the responsibility for the precursor and problem report processes and has placed emphasis on the program. The number of reports submitted is part of a licensee trending program. The number of precursor cards submitted has increased dramatically since the first of the year and the results are very positive.	Bruce Hickle		COMPLETE CP-111 on File Additionally, CP-144 (Root Cause Analysis) has been revised.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
	III. Increase the management attention devoted to managing change. This includes configuration management, procedures and processes, and organizational change. Ineffective, or incomplete, management of changes was a significant contributor to many of the events or conditions reviewed by the MRP.			
21	The project manager/team approach to plant modifications was significantly strengthened, including operations representation.	Paul Tanguay		COMPLETE Revisions to NEP-102 and NEP-212 on File
22	Formal action plans (using a specific format) were implemented for significant issues.	ALL DIRECTORS		COMPLETE Need Examples
23	A computerized Ful/Text search capability was implemented to help manage change in procedures.	Bill Conklin		COMPLETE Need system description?
24	The System Engineering Manual was updated to include instructions for use of CMIS and Ful/Text and other available tools to verify documents requiring change.	Jerry Campbell		COMPLETE Document on File
25	A check-list was added to the MAR closure process to assure all documents requiring change are completed.	Paul Tanguay		COMPLETE See # 21 above
26	Maintenance of system histories in the Tech Support area will assist with continuity through organizational change. Some examples are the quarterly report, action plans, system libraries, and system outage critiques.	Jerry Campbell		COMPLETE Examples on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
27	A check-list for discussion items to be included in screening and selection of new supervisor candidates was implemented. This provides for senior managers to emphasize change management, safety culture, and conservative decision-making with new supervisory candidates prior to organizational change.	Bill Conklin/ Rolf Widell		INITIAL ACTIONS COMPLETE TDP-205 checklist modified. Supervisor Assessmment Center evaluates change management capabilities. NucOps "red book" contains instructions regarding use of the Assessment Center and Director involvement in discussing expectations during selection process. Further actions will be evaluated.
28	The 1995 goals include reviewing the AI's and NOD's and other administrative procedures to make sure they are current. A portion of that review was completed in 1994.	Bruce Hickle	12/31/95	IN PROGRESS AIs and NODs are being reviewed.
29	Computer software controls are being audited with the purpose of improving change management.	Bill Conklin		COMPLETE Audit # 95-01-SQA completed this action. NOD-37 was revised to comply with the recommendations.
30	Nuclear Operations is taking over the in-processing and fitness for duty programs from Human Resources and has established a project team with a designated transition manager.	Larry Kelley		COMPLETE As of April 3, 1995, Nuclear Operations Access Control has been performing all tasks needed for unescorted access to CR3.
31	The Master Schedule, the fuel cycle action plan, the 90-day, weekly and daily schedules, have been implemented as instruments to regulate and control the rate of change.	Phil Skramstad/ Brent Moore		COMPLETE Need examples
32	A new section has been added to the quarterly performance indicators to look at changes occurring in fifteen different areas to arrive at an overall assessment of safety impact.	Paul McKee		COMPLETE Documents on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
33	Changes recently made to the FPC QA Plan will allow the Nuclear General Review Committee (NGRC) and the Plant Review Committee (PRC) to focus on more safety significant (as opposed to routine) issues.	Paul McKee		COMPLETE Documents on File
34	NGRC-led targeted assessments (similar to the Management Review Panel Report) will be regularly performed.	Paul McKee		COMPLETE Document on File (E. Mroczka report)
35	Management directed that a quality audit be performed on the engineering process for making and changing engineering calculations and that the audit team include NGRC and/or other independent engineering calculation expertise.	Paul McKee		E. Mroczka report- same as # 34 above. Additionally, the planned Engineering Audit in November will include these elements. (Note: Mroczka items were tracked on P. Beard's Action Item List, now on NOTES)
36	Future significant change projects will require prior completion of an action plan, schedule, and contingency plan for potentially negative outcomes.	ALL DIRECTORS		COMPLETE. PROCESS IN PLACE. Recent examples: CCHE Action Plan; CR-3 Sepoint Action Plan.
	IV. Enhance the current initiatives to improve the working relationship with the NRC, by development of a more comprehensive plan. This plan would address philosophy and expectations as well as mechanics. It should stress recognition of the value added by the regulator in each interaction. Once developed, thorough internal and external communication will be required for it to be effective.			

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
37	A revised plan regarding communication with the NRC was issued on January 6, 1995. It recognized the NRC's mission and value added by the regulatory process; however, further strengthening of this aspect is planned when the plan is converted to a nuclear operations directive (NOD).	Larry Kelley		COMPLETE NOD-03 has been implemented.
38	Senior management participation has increased in face-to-face phone conversations with Region II and NRR counterparts to share information and clarify expectations.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE. Recent examples: TSI, SWOFSI, RPS setpoints. See also example in # 44 below.
39	Each executive direct report is increasing the frequency of contact with their NRC counterpart.	ALL DIRECTORS & Jerry Campbell		COMPLETE. PROCESS IN PLACE. Meetings have been held both at the NRC and on site. See also example in # 44 below.
40	The Senior Vice President has emphasized improvement in the timeliness, directness, and completeness of NRC communications with licensing management.	Pat Beard		COMPLETE Discussions with the Sr. VP were held at the Licensing staff meeting of May 4, 1995.
41	The Senior Vice President has emphasized the need for line management involvement in the NRC communication plan.	Pat Beard		COMPLETE
42	FPC will establish routine meetings between licensing and Region II staff similar to those we continue to hold with headquarters staff.	Larry Kelley		COMPLETE

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
43	FPC will strengthen the participation of line management in safety, operability, and regulatory compliance discussions/meetings with the NRC. We must continue to emphasize, however, that licensing remains the single point of contact to arrange and facilitate FPC/NRC communications.	ALL DIRECTORS		COMPLETE. PROCESS IN PLACE. recent example: Bruce Hickle/Bill Stephenson contacted the NRC on May 16 re: NOD-14.
44	FPC will increase contact between mid- and upper-level management and their NRC counterparts.	ALL MANAGERS		COMPLETE. PROCESS IN PLACE. recent example: R. Widell, J. Lind and G. Halnon met with R II staff to discuss Licensed Operator Training on May 24, 1995. Minutes on file. OTHER EXAMPLES?
45	Clear objectives for safety/regulatory performance are being developed, as well as methods to monitor performance against these objectives.	Larry Kelley		COMPLETE (see PMB's 3/1/95 presentation to the NRC)
	V. The MRP also recommends improving the timeliness of design engineering response to plant needs.			

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
46	Internal communications were enhanced to press issues to the forefront earlier. An example is the establishment of an operator workaround list in response to the Salem event. NRC COMMENTS (From Inspection Report 95-08) The residents have reviewed the licensee's operator work-around list. The list is a comprehensive list of outstanding work-around items and includes a status column so management can keep abreast of outstanding issues. For historical purposes, the operator workarounds that have been closed are attached to the back of the list under closed items. The licensee is placing increased emphasis on the PR/PC program. A significant rise in the number of PCs written has been noted by the inspectors. Several significant trends and issues have been identified by the licensee using this process.	ALL DIRECTORS		COMPLETE (the Nuc Ops newsletter, the Operations journal and naming issue managers for specific projects, e.g. Mike Collins for CCHE are examples)
47	Engineering established an initiative to assure their customers have direct input to project priority setting.	Paul Tanguay		COMPLETE NED Prioritization Program was established to better support day-to-day plant problems.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
48	Design engineering is in the process of relocating to, and consolidating all engineering employees and appropriate technical records at, the Crystal River Site. NRC COMMENTS (From Inspection Report 95-08) The residents have discussed the relocation efforts and its impact on engineering at this time. The relocation is scheduled to be completed by August 1995 and should result in improved internal communications within FPC.	Paul Tanguay		COMPLETE
49	Managers in both design and system engineering functions have begun to increase the frequency of communication with the NRC. It has been particularly emphasized that they do so at the start of new projects and initiatives in order to communicate action plans, schedules, and contingency plans (for potentially negative results) prior to implementation.	Paul Tanguay/ Jerry Campbell		COMPLETE. PROCESS IN PLACE. Recent example: J. Masada and K. Lancaster met with the NRC engineering counterpart Chuck Casto.

Florida Power
CORPORATION

INTEROFFICE CORRESPONDENCE

Nuclear Operations Administration (OFFICE) | A7E (MAC) | 231-5682 (TELEPHONE)

SUBJECT: Additional MUT Event Corrective Actions

TO: G. L. Boldt

DATE: September 18, 1995

I agree with the actions in your attached memo of September 12, 1995. Please assign responsibility and due dates for each (all done before October 31, 1995) and will track on my Action Tickler. Also add additional corrective action:

> Develop specific examples of evolutions that are within Shift Supervisor authority to authorize and evolutions that require higher authority to authorize. Then, conduct training with Shift Supervisors and Assistant Shift Supervisors on these example evolutions and the guidance in applicable AIs.

P. M. Beard, Jr.

PMB:mf

xc: B. J. Hickle
G. H. Halnon
R. M. Bright-Action Tickler

Florida Power
CORPORATION

INTEROFFICE CORRESPONDENCE

NUCLEAR PRODUCTION	SA2C	240-4594
Office	MAC	Telephone

SUBJECT: Additional MUT Event Corrective Actions

TO: P. M. Beard, Jr.

DATE: September 12, 1995
VPNP95-0052

At your request, I reviewed the report of Dan Poole's team investigation of the September 4, 1994, MUT test ("Investigation of Possible Misconduct - Phase I - Final Draft", dated August 18, 1995) to determine if additional corrective actions were warranted to address the opinions and/or conclusions of that report.

I believe additional actions are appropriate and have summarized them in the attachment to this memorandum. I have discussed these actions with Bruce Hickle and he concurs.

G. L. Boldt

GLB:lss

xc: D. C. Poole
B. J. Hickle
L. C. Kelley
G. M. Williams

ADDITIONAL MUT EVENT CORRECTIVE ACTIONS

1. Revise page 16 of AI-400B (Enclosure 3) so that step 1 is more broadly focused as shown on the attached revised pages.

2. Revise page 17 of AI-400B (Enclosure 3) so that the checklist for infrequently performed tests or evolutions is approved by the DNPO or his designee (usually the shift manager). See attached page.

3. Revise AI-500, page 46, step 4.3.2.3.2 to assure the intent of the procedure or evolution is also considered by the shift supervisor and that he follows the following four steps when in doubt:

   - Communicate
   - Approve
   - Plan
   - Schedule

   See attached pages.

4. The management review panel process (MRP) is a good concept but fell short in application when used to initially review the MUT event. Expand the MRP process to apply to all potential NRC violations whether self-identified or NRC-identified. Draft a charter or guideline for conducting MRP's to assure consistency and thoroughness of reviews. Some items that should be included are:

   - an attempt to interview all personnel involved, including support groups where appropriate;
   - assurance that CP-111 and CP-144 have been fully applied as appropriate;
   - review of all appropriate logs, chart recordings, completed procedures, REDAS data, annunciator printouts, and other relevant documentation;
   - review for generic aspects of the event, i.e., similar violations, events, errors, systems, etc.;
   - assure both technical and human performance aspects of the issue get equal attention.

5. There is some evidence that operations log entries remain imprecise or incomplete. Schedule further audits and/or training on the topic of adequate log keeping. Consider reinforcing log keeping practices by running table top or simulator exercises specifically for this purpose.

GLB:lss

INFREQUENTLY PERFORMED TEST OR EVOLUTION CHECKLIST

Answer the following questions to determine if this procedure describes an infrequently performed test or evolution.

IF unable to make a determination following completion of this checklist, THEN consult the ONPO for final decision.

1. Does this procedure create a situation that can affect the core, reactivity control, or the reactor protection system?

   ☐ NO — IF the answer is no, THEN this checklist is complete and it is NOT to be included in the procedure package.

   ☐ YES — IF the answer is yes, THEN SOER 91-01, Conduct of Infrequently Performed Tests or Evolutions (available from the Operations Technical Advisors), should be reviewed to help assure adequate controls are in place for the optimization of reactor safety, AND continue on with this checklist.

See next page for revision

2. Does this procedure create an evolution not covered by an existing normal or abnormal operating procedure?

   ☐ YES ☐ NO

3. Does this procedure create an evolution that will seldom be performed, even though it is covered by an existing normal or abnormal operating procedure?

   ☐ YES ☐ NO

4. Does this procedure create an infrequently performed surveillance test that involves complicated sequencing, or placing the plant in an unusual configuration?

   ☐ YES ☐ NO

5. Does this procedure required the use of a special test procedure in conjunction with existing operating or testing procedures?

   ☐ YES ☐ NO

plant safety,

1. Does this procedure create a situation that can affect the core, reactivity control, ~~or~~ the reactor protection system, ~~the~~ engineered safeguards systems, or the plant design basis?

☐ NO — IF the answer is no,
THEN this checklist is complete and it is NOT to be included in the procedure package.

☐ YES — IF the answer is yes,
THEN SOER 91-01, Conduct of Infrequently Performed Tests or Evolutions (available from the Operations Technical Advisors), should be reviewed to help assure adequate controls are in place for the optimization of reactor safety,
AND continue on with this checklist.

IF the answer to question 1 AND at least one other question is "YES," THEN this procedure is an infrequently performed test or evolution and requires a briefing in accordance with AI-500 prior to being performed. The procedure shall contain a sign off step, either as a prerequisite to performing the procedure or as its first step, that documents this briefing having been performed. This can be included in the procedure as shown in the example below.

Example:

4.1 Initial Conditions

4.1.1 Perform a DNPO pre-job briefing in accordance with AI-500, Conduct of Operations.

DNPO pre-job briefing has been completed for each new shift

0000-0800 _____/_____
DNPO or Designee/Date

0800-1600 _____/_____
DNPO or Designee/Date

1600-2400 _____/_____
DNPO or Designee/Date

Other Shifts List Below:

_____/_____
DNPO or Designee/Date

_____ _____
Performed By Date

_____ _____
Approved By DNPO or Designee Date

revision

4.3.2.3 General Practices for Procedure Implementation

4.3.2.3.1 AI-400A, Description and General Administration of Plant Procedures, Section 4.1, Requirements for Approved Written Procedures, must be utilized to determine if a procedure is required for an evolution.

4.3.2.3.2 Written procedures are also needed for those evolutions that would affect a change in the system flowpath or operating parameters.

- The boundary between an "evolution" and a "task" may not always be clear and, as such, it is expected that plant operators will encounter situations where the adequacy of existing procedures may be questioned.

See next page for revision

  a. In these instances, shift supervision will make the determination as to what procedural requirements are applicable.

4.3.2.3.3 For procedures performed by Plant Operations, the Shift Supervisor or his designee shall ensure the principles of Enclosure 19, Pre-Job Briefing Checklist, are met.

- Using his judgement in regard to plant safety, the SSOD may elect to formally complete Enclosure 19, Pre-Job Briefing Checklist, for the applicable procedure.

4.3.2.3.4 Written procedures are not necessary for situations where:

- Prompt actions are being taken (including troubleshooting, locating, and isolating problems) where detrimental system interaction would result if the prompt actions were not taken.
- Prompt actions are being taken to prevent an undesired loss of process system medium
- Prompt actions are being taken to prevent an inadvertent system actuation (when the system is no longer required to be OPERABLE)
- The activities are performed under the requirements of a CP-115 Tagging Order.

4.3.2.3.5 Except in emergency or abnormal operating situations where immediate actions are required to protect the health and safety of the public, to protect equipment or personnel, or to prevent the deterioration of plant conditions to a possibly unsafe or unstable level, the operation of equipment shall be preplanned and performed in accordance with approved written procedures.

- When approved written procedures would be required and are not used, the activities that were accomplished shall be documented after-the-fact and receive the same degree of review as if they had been preplanned.

4.3.2.3.2 Written procedures are also needed for those evolutions that would affect a change in the system flowpath or operating parameters.

- o The boundary between an "evolution" and a "task" may not always be clear and, as such, it is expected that plant operators will encounter situations where the adequacy of existing procedures may be questioned.

- o When questioning the adequacy of existing procedures, plant operators should also consider the intent of the evolution or task to be performed in comparison to the original intent of the existing procedure. OP-406, "Spent Fuel Cooling System" was intented to provide instructions for normal startup, operation, and shutdown of the system. It was not intended to be used to permit shutdown of both cooling trains with fuel in the pool for the purpose of plotting heatup rates of the pool water temperature (i.e. intentionally approaching alarm or operating curve limits).

a. In the above instances, shift supervision will make the determination as to what procedural requirements are applicable or whether a new procedure must be prepared and approved.

b. However, whenever in doubt, it is expected that shift supervision will:

- Communicate the problem to higher management (especially the shift manager)
- Assure approval of appropriate management and review groups
- Plan the job (including preparation of appropriate procedures)

Rev. 0

Effective Date 10/4/95

COMPLIANCE PROCEDURE

CP-150

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

IDENTIFYING AND PROCESSING OPERABILITY CONCERNS

THIS PROCEDURE ADDRESSES SAFETY RELATED COMPONENTS

THIS PROCEDURE ADDRESSES EQ EQUIPMENT

APPROVED BY: Interpretation Contact

(SIGNATURE ON FILE)

DATE: 10/4/95

INTERPRETATION CONTACT: Manager, Nuclear Plant Operations

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ENCLOSURES

1.0 PURPOSE

1.1 This procedure provides instructions for determining the operability of components required to maintain safe operation of the plant. This procedure also provides guidelines for determining safety function status to ensure there is no loss of safety function.

2.0 REFERENCES

2.1 IMPLEMENTING REFERENCES

2.1.1 CP-111, Initiation and Processing of Precursor Cards and Problem Reports

2.2 DEVELOPMENTAL REFERENCES

2.2.1 Improved Technical Specifications for Crystal River Unit 3.

2.2.2 Enhanced Design Basis Document

2.2.3 Fire Protection Plan for Crystal River Unit 3.

2.2.4 Crystal River Unit 3 Offsite Dose Calculation Manual

2.2.5 NRC Generic Letter 91-18, Resolution of Degraded and Nonconforming Conditions and Operability

2.2.6 Crystal River Unit 3 Final Safety Analysis Report

2.2.7 10CFR 50, Appendix B Criterion XV and XVI

3.0 PERSONNEL INDOCTRINATION

3.1 DEFINITIONS

3.1.1 **Component**

Used, in this procedure, to identify any system, subsystem, train, component, device or structure required to be operable.

3.1.2 Current Licensing Basis (CLB)

Much of the CLB is contained in the FSAR. Additionally, commitments made to the NRC have expanded the CLB outside of the FSAR. A number of accidents are mitigated using current design and procedures for which the plant was not initially designed but are now a part of the CLB. These include but are not limited to:

- Station Blackout Accident (Code Key BB in CMIS)
- Anticipated Transient Without SCRAM (ATWS) (Code Key ZZ)
- Toxic Gas
- Appendix R Fire (Code Key AR, PP)
- Environmental Qualification (Code Key QQ)
- Pressurized Thermal Shock and LTOPs

3.1.3 Design Basis Accident (DBA)

Those accidents described in Chapter 14 of the Final Safety Analysis Report (FSAR) which the plant was *designed* to mitigate. The following list identifies those accidents:

- Uncompensated Operating Reactivity Changes
- Startup Accident
- Rod Withdrawal at Rated Power Operation Accident
- Moderator Dilution Accident
- Cold Water Accident
- Loss-of-Coolant-Flow Accident
- Stuck-Out, Stuck-In, or Dropped Control Rod Accident
- Load Rejection Accident
- Steam Line Failure Accident (Cases I & II only)
- Steam Generator Tube Rupture Accident
- Fuel Handling Accidents
- Rod Ejection Accident (excluding Section 14.2.2.4.5)
- Loss-of-Coolant Accident
- Makeup System Letdown Line Failure Accident
- Waste Gas Decay Tank Accident
- Loss of Feedwater and MFW Line Break Accident (excluding a loss of all feedwater - MFW & EF)

3.1.4 Design Basis Event (DBE)

Conditions of normal operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure: 1) the integrity of the reactor coolant pressure boundary, 2) the capability to shut down the reactor and maintain it in a safe shut down condition and, 3) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10 CFR Part 100 guidelines."

3.1.5 Justification For Continued Operation (JCO)

A JCO is the technical basis for permitting continued operations in the specified mode when a component is determined to be *operable but degraded or inoperable*. The JCO describes an adequate safe configuration and operating mode of the plant considering the degraded condition being evaluated. The JCO is documented in section 8 of Enclosure 1, Operability Concerns Resolution Report.

3.1.6 Mission Time

The total time frame the component is required to be operable or operating to mitigate the most limiting accident. The most limiting accident is the accident which challenges the component with the longest mission time. This is a measure of reliability and must be considered when doing operability evaluations.

3.1.7 Mitigative Function

Some components are used in the EOP and AP to more readily mitigate transients but are not part of the design basis of the plant. The components may be non-safety related, however, it is important to the training and ease of use of the procedures. Failure of this equipment does not constitute operation outside the CLB, but it is important to the safety of the plant.

3.1.8 Operability Classes

A component shall be Operable when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the component to perform its specified safety function(s) are also capable of performing their related support function(s).

A component shall be Inoperable if it is not capable of performing its specified safety function(s).

A component may be Operable But Degraded if it is not fully qualified but still capable of performing its specified safety function(s) with additional compensatory measures or explanation.

3.1.9 Operability Concern Resolution (OCR) report

A report documenting an evaluation comparing the intended safety function(s) of a component with accident scenario(s) it is designed to mitigate. Available information is gathered and reviewed to arrive at a recommendation concerning whether a component is operable or inoperable. Included in this evaluation is the mission time of the component for accidents using the longest as the basis for adequate reliability. The OCR report is provided to the SSOD for use in the operability determination. The tracking numbers for OCRs are not unique. An OCR for the same component in the same calendar year have identical numbers, ensuring new evaluations include active OCRs for the same component.

3.1.10 Operability Determination

The decision, by the SSOD, as to whether or not a component meets the definition of operability at a given time.

3.1.11 Operability Evaluation

The process by which information pertaining to the condition of a component identified as degraded is documented on Enclosure 1, Operability Concerns Resolution form (OCR).

3.1.12 Risk Levels

Risk Levels communicate the SSOD's assessment of the safety significance of the concern. The Risk Level drives the conduct of the Operability Evaluation.

Level 1: Potential to cause loss of safety function or may pose a challenge to systems used to protect TS safety limits. Evaluation is to proceed continuously until resolved.

Level 2: Safety-related equipment and equipment used to mitigate accidents by the EOP. Evaluation is to proceed continuously until resolved or, at management's discretion, on day shift through the weekends.

Level 3: Equipment important to safety and equipment used to mitigate transients in APs. Evaluation is to proceed continuously on day shift only, which may include weekends.

Level 4: Low safety significance based on low probability of event occurring, near incredible circumstances required, and events where the impact is low or procedures, training, personnel skills proven to compensate adequately. Evaluation is to proceed on normal day shift only and is expected to be continuous.

3.1.13 Safety Function

That function which is used to mitigate a Design Basis Event. The safety function of a component is typically described in ITS Bases, FSAR, Analysis/Calculations, or the EDBD.

3.1.14 Single Failure

An occurrence which results in the inability of a component to perform its intended safety function. Multiple failures resulting from a single occurrence are considered to be a single failure. Fluid and electric systems are considered to be designed against assumed single failures if neither:

1. A single failure of any active component (assuming passive components function properly) or

2. A single failure of a passive component (assuming active components function properly) AND

3. Results in a loss of the capability of the system to perform its safety functions.

3.2 RESPONSIBILITIES

3.2.1 Personnel who discover degraded equipment

Anyone who works in a job related to CR-3 may discover a condition where a component important to safety is degraded or its ability to reliably perform its safety function is questionable. It is the responsibility of anyone who identifies such a condition to begin a corrective action process (work request, precursor card, problem report, etc.)

If the condition is believed to affect the operability of the component, or if the discoverer is unsure, the Nuclear Shift Manager and Shift Supervisor On Duty must be notified immediately.

Sometimes it is difficult to determine exactly when enough is known about a specific concern to begin the operability determination process. If enough information is available to show there is reason to question whether a component can be relied upon to perform its intended safety function then the SSOD and NSM must be notified immediately.

3.2.2 Nuclear Shift Supervisor on Duty (SSOD)

Responsible for immediately determining whether components are clearly operable, clearly inoperable, or potentially inoperable.

The SSOD must then determine the Risk Level, an adequate level of safe operation of the plant, and provide reasoning supporting this decision.

The SSOD must determine whether or not there is a loss of safety function when additional inoperable components exist at the same time.

3.2.3 Nuclear Shift Manager (NSM)

The NSM ensures the appropriate resources are allocated for evaluating safety significance and resolving the operability question. The NSM ensures individuals capable of interpreting regulatory requirements, design requirements, and assessing the significance of the issue or condition are involved in the process.

The NSM assigns the person(s) responsible for writing the OCR report.

The NSM establishes and maintains the conduct of the evaluation. The NSM ensures operability evaluations are:

- Conducted commensurate with the established Risk Level.
- Ensures OCRs are complete and adequate information is provided to the SSOD to support the recommendation.

The NSM represents plant management and keeps management informed on the progress of the evaluation.

3.2.4 Manager, Nuclear Plant Operations (MNPO)

The MNPO acts as the Interpretation Contact and ensures SRO resources are available to provide for safe operation of the plant while the SSOD is involved in detailed briefings of the operability evaluation. This may necessitate calling personnel in or supplying other assistance to the Control Room staff during the briefings.

3.2.5 Department Managers

Ensures the individual assigned to write and collate the report is assisted, as necessary, with clerical and technical support. The assigned individual is responsible to finish the report and department managers are accountable for the ensuring the product meets professional standards.

3.2.6 Plant Review Committee (PRC)

The PRC is responsible for:

- o Reviewing new OCRs on a regular basis (a special PRC meeting is not necessary unless requested)
- o Performing an aggregate review for plant conditions
- o Periodically reviewing active OCRs
- o Maintaining a book of active OCRs in parallel with the SSOD

3.3 OPERABILITY DETERMINATION PRINCIPLES

3.3.1 Operability Philosophy

A component is either classified as inoperable or operable. This procedure has the SSOD initially determine which operability classification applies to the degraded component. If adequate information is not available, the SSOD makes an immediate disposition with the information at hand as either conditionally operable or inoperable. In either case, an OCR report is completed to ensure the immediate disposition is correct, to provide additional compensatory actions, and a Justification for Continued Operation if required. After the evaluation, the SSOD makes the final operability determination based on the recommendation on the OCR.

3.3.2 Safety Focus

All operability evaluations shall be made such that primary focus is nuclear safety. Components shall be declared inoperable immediately if there is not a reasonable expectation that they can reliably perform their intended safety function.

3.3.3 Timeliness

Operability evaluations shall be prompt. Risk Levels established by the SSOD are commensurate with the safety significance of the concern. Using action statement times from ITS can provide a relative idea of the safety significance and guidance for selecting a Risk Level. Components with action statements of 30 days, for example, have a lower safety significance than those with action statements of 72 hours. The Risk Level provides a timeline for the conduct of the evaluation.

3.3.4 Conditional Operability/Potential In-Operability

IF a component has passed all surveillance tests,
THEN it can be assumed to be operable until the next surveillance test.
IF a condition is identified in the interim which puts into question the full qualification of the component,
THEN information must be brought to the SSOD.

There are situations where the determination can not be made with 100% assurance due to the complexity of the issue. At this point, the component is potentially inoperable and the SSOD must make an interim call based on the information available. This information includes equipment performance, both present and historical, surveillance test results, judgement, and similar configuration of other plants. The interim call may be Inoperable or Operable. Commensurate with this interim call is ensuring the plant is in a safe configuration. If determined to be Operable, the component is actually Conditionally Operable/Potentially Inoperable, and delineated as such, depending on the outcome of the evaluation.

Evaluating operability is an ongoing process. There is no indeterminate condition of operability. ***Operability of a component is based on evidence at the time, therefore, such an evaluation may change as additional information is obtained.***

3.3.5 Qualification vs Operability

Evaluating operability is a distinctly different process than evaluating conformance to CLB. Nonconformance with the CLB does not necessarily result in a component being inoperable.

Full qualification is conformance to all aspects of the CLB. A component which is fully qualified has no outstanding concern on its operability. A component that is not fully qualified may be operable if it is still capable of performing its specified safety function. Until an evaluation is performed, however, components not fully qualified are potentially inoperable. An evaluation may subsequently determine the component to be degraded but operable, but it will not be fully qualified. To restore qualification, either the concern must be fully dispositioned or the CLB changed.

4.0 INSTRUCTIONS

4.0.1 This instruction describes the instructions for identification and handling of operability issues at Crystal River Unit 3. The process is made up of 7 distinct phases. They are:

PHASE 1: Identification
PHASE 2: Evaluation
PHASE 3: Determination
PHASE 4: Reporting
PHASE 5: Interim Operations
PHASE 6: Deficiency Resolution
PHASE 7: Long-Term Follow-Up

4.0.2 The identification and resolution of operability issues will take precedence over routine daily activities. Any threat to the level of safety of the plant is to be fully investigated and resolved as a top priority.

4.0.3 AI-502, Defueled Plant Operation, and AI-504, Guidelines for Mode 5 and Reduced Reactor Coolant System (RCS) Inventory Operation, each contain requirements for equipment operability at times when ITS may not require operability. It is management's position that this equipment is required to be operable as described in applicable procedures.

4.1 PHASE 1: IDENTIFICATION

4.1.1 The identification phase is critical since this is where degraded conditions are found and input into the process flow path.

4.1.2 Operability is a continuous process performed through normal plant operation.

- Everyone is responsible for this phase of the process.
- Degraded conditions are identified by:
  - Self-revealing failures
  - Surveillance and performance tests
  - Plant tours
  - System and component walkdowns
  - Work requests
  - Trouble tickets
  - Precursor cards
  - Problem reports
  - Equipment performance reports
  - Logs
  - Review of operational events
  - Examination of records
  - Vendor reviews or inspections
  - Other documents describing plant conditions

4.1.3 Personnel reviewing station documents and touring the plant must ensure all degraded conditions are evaluated for operability. The following circumstances require operability determinations:

- o Discovery of degraded conditions of components where performance is called into que tion
- o Discovery of nonconforming conditions where the qualification of equipment (codes, standards, Equipment Qualification, etc.) is called into question
- o Discovery of an existing but previously unanalyzed condition or accident where the component will be called upon to mitigate the consequences

4.1.4 PHASE 1: Degraded Condition Identified

Identifier:

1. Is this component important to the safety of the plant?
   - Does not necessarily have to be safety-related
   - Code Keys in CMIS identifies equipment which serve some function important to safety, each Code Key must be researched if function is not obvious
   - Equipment required to be operable per the Fire Protection Plan
   - If unsure, obtain help from the NSM or SSOD
2. **IF YES:** Continue to item 3 of this phase of the operability process.

   IF NO: Ensure the impact to plant operations is determined and communicated to the SSOD and NSM. A determination will be made to include the component as emergent work and any subsequent compensatory measures for the plant. **EXIT THE PROCEDURE**
3. Notify the SSOD or NSM a degraded condition and potential operability question has been discovered.

NOTE: The SSOD is expected to maintain a questioning attitude and act conservatively when evaluating degraded components. The SSOD carefully reviews and understands all nformation received from the NSM and other individuals before using the OCR as a basis for operability determination.

SSOD:

1. Evaluate the degraded condition for immediate disposition. Consider:

   - What is the intended safety function?
   - What is degraded?
   - How does this affect the performance, reliability, and ability to fulfill intended function?

NOTE: Enclosures 2 and 3 provide some examples of clearly inoperable and potentially inoperable.

2. If the component is important to safety:

   - Make immediate disposition

   Clearly Operable:
   - o Log the issue
   - o Describe why this is clearly operable

   Clearly Inoperable:
   - o Log the issue
   - o Describe why this is clearly inoperable
   - o Enter the appropriate action statements
   - o Complete Enclosure 4, Loss of Safety Function Determination. (transmit with AI-500 logs)

   Complex Requiring Further Review
   - o Initiate Enclosure 1, OCR, page 1
   - o Make an Immediate Disposition
   - o Assign a Risk Level
   - o Log the issue
   - o Document the basis for immediate disposition

NOTE: Determine an acceptably safe configuration for the plant. This may mean, for example, taking compensatory actions, placing a different train in operation, or the "do nothing" alternative.

   - o Place the plant in a safe configuration and document the reasoning behind the decision

3. If Inoperable or Conditionally Operable/Potentially Inoperable, check PSAM for immediate impact.

4. If the disposition was Complex Requiring Further Review then notify the NSM to start an Operability Evaluation using Enclosure 1, OCR, pages 2 and 3.

   o Assign a OCR Number

     - XX-YY-TAG
     - XX: Two Letter System from CMIS
       YY: Year
       TAG: The component tag number

   o Place a copy of the OCR page 1 in the Interim Operations Log

   o Provide concerns and potential areas to address to the NSM

NSM:

o Receives the OCR from the SSOD and implements Phase 2: Evaluation.

4.2 PHASE 2: EVALUATION

NOTE: When conditionally operable equipment is being evaluated, the NSM should consider the safety and legal consequences if the component is determined to be inoperable. The NSM should provide guidance to the plant staff if parallel contingency paths are prudent such as maintenance, modifications, procedure changes, communication with the NRC region, etc.

4.2.1 ***NSM:***

1. Decides to have the OCR form filled out by the responsible department or by committee.

2. Assigns committee members or responsible department

3. Ensures significant facts are periodically communicated to the SSOD

4. Ensures the schedule of the operability evaluation is commensurate with the assigned risk level.

5. Attaches Enclosure 1, page 3, to the report and obtains the approvals of Licensing, Engineering and Operations department.

6. Assigns an individual to initiate a Problem Report if one has not been already initiated, and to perform CP-111 in parallel.

4.2.2 The OCR should follow the checklist of page 2 on Enclosure 1, OCR. Each item on the checklist is required to be checked.

4.2.3 The necessary personnel involved in completing the OCR, as determined by the NSM, should accompany the NSM to the control room.

4.3 PHASE 3: DETERMINATION

4.3.1 The personnel performing the operability evaluation should brief the SSOD on the contents of the OCR.

4.3.2 *SSOD:*

1. Obtains answers to questions
2. May request PRC review and approval prior to making the determination if additional assurance is desired.
3. Makes the operability determination
4. Documents the determination in the SSOD log book

4.3.3 *NSM ensures the OCR*:

1. Copied to the SSOD Interim Operations Tracking Book
2. Copy sent to the DNPO
3. Copy sent to the PRC Secretary
4. Sends the original to the Problem Report

4.4 PHASE 4: REPORTING

4.4.1 Reporting requirements are determined by existing plant procedures, primarily CP-111, Initiation and Processing of Precursor Cards and Problem Reports.

4.4.2 Attach the original OCR to the Problem Report. The Problem Report will govern the remaining corrective action plan.

4.5 PHASE 5: INTERIM OPERATIONS

NOTE: While a component within the scope of the Operability Process continues to be degraded, the plant is in a mode of interim operations for that component.

4.5.1 Interim operations is defined as:

- o Operation authorized by the license
- o Operation in an action statement of the appropriate license document
- o Continued operation is contingent on NRC action and comoliance with a required action is in progress
- o Operation is acceptable, no corrective action required
- o Operation is acceptable during corrective actions
- o Placement of plant in mode of acceptability is required

4.5.2 If the determination was Inoperable:

- o Action statements may define the requirements of interim operations
- o The OCR may require additional compensatory measures
- o The appropriate action statement and compensatory measures are to be implemented immediately
- o If a Notice of Enforcement Discretion (NOED) is being developed for potential enforcement discretion, compliance with associated action statements is mandatory until such approval from the NRC to deviate from the license is obtained

4.5.3 If the determination was Operable but Degraded:

- o Compensatory measures become applicable immediately and must be implemented without delay
- o The NSM determines any special needs for resolution using the OCR and associated Problem Report
- o Section 8.0 of the OCR report must fully justify continued operation

4.5.4 The PRC must review the determination at the next regularly scheduled PRC meeting.

4.6 PHASE 6: DEFICIENCY RESOLUTION

4.6.1 The resolution of the degraded function may, but is not limited to, take the form of modifications, replacements, maintenance, analysis, or procedure changes.

4.6.2 The Problem Report sets the time line for resolution of the item.

- o It is important to minimize the time compensatory measures are required (these are often work arounds and may have an aggregate impact on plant operations)
- o The time line of action completion should take into consideration the safety significance of the issue

4.7 PHASE 7: LONG TERM FOLLOW-UP

4.7.1 Throughout the closure process, the NRC Senior Resident should be provided information so the open NRC item can be closed.

4.7.2 The PRC determines if a periodic review is required to ensure conditions described by the OCR are still applicable and if any other conditions have changed requiring further assessments.

4.7.3 The PRC performs an aggregate review of active OCRs twice per year approximately 6 months apart, or as specified by the PRC chairman considering recent OCRs.

- o Active OCRs are reviewed to ensure no loss of safety function is present, or that the 12 week maintenance schedule provides for continued safe operation.

Operability Concern Resolution	
Tag Number	Description

OCR Number	Revision	Date

Operations Immediate Disposition	[]Conditionally Operable/ Potentially Inoperable [] Inoperable
Risk Level	[] Level 1 [] Level 2 [] level 3 [] level 4

Basis for Immediate Disposition:
*provide reasoning for decision regarding safest action for the plant

SSOD Desired Target Date/Time:_____ PSAM Color:_____
Basis for Risk Level and Target Date/Time:

SSOD/Ops SRO	Date/Time
Person(s) Providing Information	Phone

Risk Levels

Level 1: Potential to cause loss of safety function or may pose a challenge to systems used to protect TS safety limits. Evaluation is to proceed continuously until resolved.

Level 2: Safety-related equipment and equipment used to mitigate accidents by the EOP. Evaluation is to proceed continuously until resolved or, at management's discretion, on day shift through the weekends.

Level 3: Equipment important to safety and equipment used to mitigate transients in APs. Evaluation is to proceed continuously on day shift only, which may include weekends.

Level 4: Low safety significance based on low probability of event occurring, near incredible circumstances required, and events where the impact is low or procedures, training, personnel skills proven to compensate adequately. Evaluation is to proceed on normal day shift only and is expected to be continuous.

Operability Concerns Resolution Report Checklist

OCR Number	Revision	Date

Checklist:

1.0 Description and Purpose
- ☐ Abstract of the concern
- ☐ Circumstances of discovery described
- ☐ Component clearly described

2.0 Safety Classification
- ☐ Safety class described with basis document identified.

3.0 Current Licensing Basis
- ☐ Source document(s) identified where design basis is extracted
- ☐ If applicable, use NOCS and FULTEXT
- ☐ Applicable active OCRs are considered
- ☐ Current licensing basis is clearly understood

4.0 Description of Identified Concern
- ☐ Concern fully explained
- ☐ Impact on the operation and component function described
- ☐ Diagrams/figures attached if applicable

5.0 Impact Analysis and Reliability Considerations

5.1 Impact on Current Licensing Basis Accidents
- ☐ Impact of concern in Section 4.0 compared against each accident identified in Section 3.0.

5.2 Reliability Considerations of Component
- ☐ Mission time explained and analyzed

6.0 PSA Evaluation
- ☐ PSA numbers included (if applicable)

7.0 Operability Evaluation

Answer:
- ☐ "Can it still perform its function and how"?
- ☐ "What additional measures are required to enable this component to perform its function"?

☐ Extent of qualification described.
- operable, fully qualified
- operable but degraded
- inoperable, include Enclosure 4, Loss of safety Function Determination

8.0 Justification for Continued Operation
- ☐ Mode of plant operation
- ☐ Required compensatory measures
- ☐ Reasons justifying above

9.0 Corrective Action to Obtain Full Qualification
- ☐ What has to be done to obtain full qualification?
- ☐ When will it be accomplished?

10.0 References

11.0 Attachments and Figures

Report Writer	Date/Time
NSM	Phone

CRYSTAL RIVER UNIT 3

Operability Concern Resolution Evaluation Report

Tag Number	Description

OCR Number	Revision	Date	PR Number

Personnel Involved with Preparations

Print Name and Title	Signature

Approvals

Operations

Signature	Title	Date

Engineering

Signature	Title	Date

Licensing

Signature	Title	Date

Plant Review Committee

PRC Mtg Number: Date:

PRC Chairman:

ITEMS CLEARLY INOPERABLE

A. A component that is unable to perform its specified function(s) because of obvious failure, damage, malfunction, or because it is disabled for testing or maintenance is inoperable.

B. A component that trips (where tripped is not the safety function condition) is inoperable unless it can be restarted promptly, without performing maintenance. If the attempt at restart is unsuccessful, the component is inoperable. The time frame for compensatory action begins at the time of the initial trip.

C. A component is inoperable when a support system is not capable of performing its related support function. However, if it is determined that the component is capable of performing its intended function even with an inoperable support system, then the ITS supported system may be considered operable.

D. A component that fails to meet quantitative acceptance criteria specified in a ITS Surveillance Requirement (SR) is inoperable. Failure of a component to meet quantitative acceptance criteria specified in Surveillance Procedures is inoperable unless the Surveillance Procedure acceptance criteria is more conservative than the existing ITS SR acceptance criteria and the results of the surveillance is clearly within the acceptance criteria of ITS SR.

E. A component is inoperable if it fails to meet a safety function requirement identified in a docketed letter to the NRC that specifically describes what its functional capability/requirement is.

F. A component is inoperable if it is configured resulting in the loss of safety function or a loss of capability to withstand a single failure, if required.

G. If calculations indicate that a component will not be able to perform as needed to mitigate the affects of a design basis accident, then it is inoperable.

ITEMS POTENTIALLY INOPERABLE

A. A suspected error in any analysis that could affect the functional status of a component.

B. A lack of documentation that could affect the functional status of a component.

C. A minor deviation (incorrect bolt size, tolerance/clearance, etc.) found in a component. Also included in this category are items such as unevaluated installation of lead shielding on a system or removal of a component from a system without using temporary restraints and without a prior Engineering Evaluation.

D. An unfulfilled EQ installation or maintenance requirement for a component or device where the impact is not obvious.

EXAMPLE: The EQ Program may require O-rings be replaced with new O-rings every time a cover is removed from a device and at least once every five years. The consequences of failure to replace the O-ring at the end of the five year interval may not be clear, and may or may not cause the device to be inoperable.

EXAMPLE: An unidentified wire is found in an EQ valve operator and there is not sufficient information available to determine whether the wire is suitable for the application.

EXAMPLE: EQ Calculations may document a required replacement interval (Qualified Life). The consequences of failure to replace these EQ components after an expired interval, as outlined in appropriate EQ calculation, may or may not cause the device to be inoperable.

E. An item found in nonconformance with electrical separation criteria specified in the FSAR.

F. An item found in noncompliance with physical separation or mechanical isolation requirements specified by Plant Drawings, Operating Procedures, Fire Hazards Analysis, etc.

G. Equipment found out of tolerance in the non conservative direction.

H. When a component is found to be outside its design basis, it may be considered operable when it is judged that the component is capable of performing its specified function(s). Further testing, calculations, etc. may be required to support this position.

I. Discovery of an unanalyzed condition associated with the current design basis (i.e., an unanalyzed condition which should have been analyzed).

Loss Of Safety Function Evaluation

Component Tag Number

Date/Time of Discovery:
(from Page 1 of OCR)

1. Are any other Action Statements In Effect: [] NO: No actions necessary
[] YES: Continue

2. Verify redundant train component/system operability

List redundant systems, structures, and components:

System/Structure/Component	Operability Status

If any are inoperable, then immediately notify the SSOD to enter ITS LCO 3.0.3

3. Determine operability impact of components the OCR component supports.

List supported systems, structures, and components:

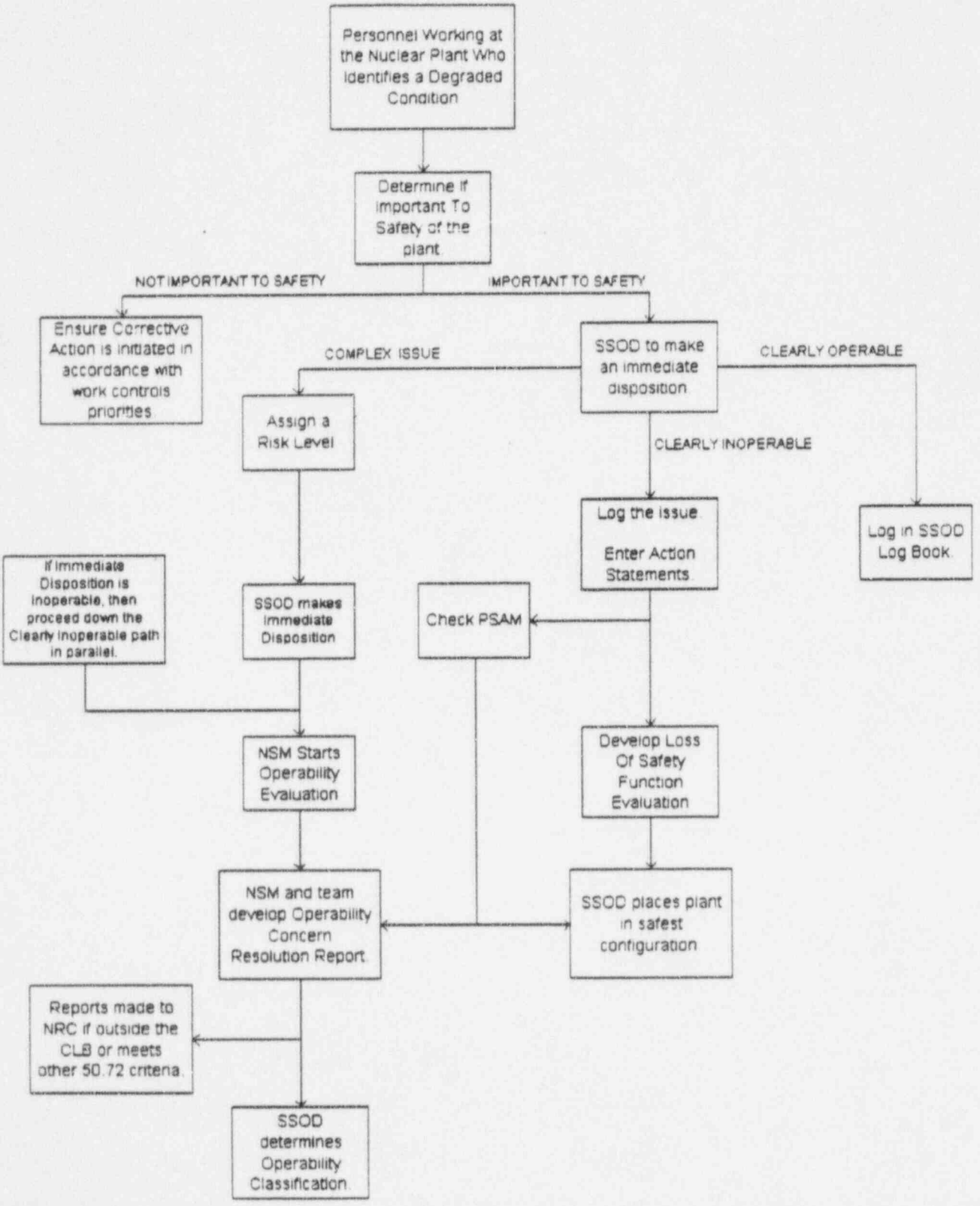
System/Structure/Component	Operability Status of OPPOSITE TRAIN component

If any are inoperable, then a loss of safety function may exist. If the actions of ITS LCO's do not address the existing condition, then LCO 3.0.3 shall be entered immediately. Actions for items not covered by ITS shall be discussed with the DNPO/MNPO prior to taking action.

Completed By: _____ Date: _____

Reviewed By: _____ Date: _____
Operations SRO

OPERABILITY CONCERN EVALUATION



FOCUS ITEM / KEY ISSUES STATUS -- October 12, 1995				
Sponsor	**Manager**	**Item / Issue**	**Action Plan Status Date**	**% Completed**
Bruce Hickle	Bill Stephenson	Improve Operability Determination Process (Senior Management Focus Item # 1)	10/05/95 09/22/95	100% 90%
Gary Boldt	Dan Kurtz	Enhance Communications Daily (Senior Management Focus Item # 2)	09/28/95 08/16/95	70% 60%
Pat Beard	Sarah Johnson	Improve Teamwork with Manager Level Emphasis (Senior Management Focus Item # 3)	08/23/95	10%
Larry Kelley	Brian Gutherman	Improve Communications with NRC (Senior Management Focus Item # 4)	09/15/95 08/21/95	75% 70%
Bruce Hickle	Jerry Campbell	Assess impact of 24 month operating cycle on long-term reliability (Senior Management Focus Item # 5)	09/16/95 08/21/95	60% 50%
Larry Kelley	Bill Rossfeld	Thermo-Lag	09/15/95 08/16/95	60% 60%
Paul Tanguay	Gary Becker	Make-Up Tank (MUT) and Borated Water Storage Tank (BWST) / Reactor Building Sump	09/15/95 08/18/95	70% 61%
Bruce Hickle	Sid Powell	Control Room Habitability Envelope	10/02/95 09/01/95	76% 75%
Paul Tanguay	Don Shook	Power Level Upgrade	09/15/95 08/15/95	25% 25%
Jerry Campbell	Gary Williams	Instrument Air / Station Air	09/13/95 08/18/95	70% 66%
Jerry Campbell	Mike Donovan	Service Water System Operational Performance Inspection (SWSOPI) / Service Water	09/21/95 08/08/95	80% 50%
Bruce Hickle	Gary Becker	Emergency Operating Procedures (EOPs) Upgrade	09/15/95 Phase 2	70% Draft
Bruce Hickle	Steve Koleff	Extend Improved Technical Specification surveillances from 18 months to 24 months	09/14/95 08/23/95	78% 75%
Larry Kelley	Steve Koleff	Improved Technical Specification Setpoints	09/15/95 08/22/95	65% 60%
Pat Beard	Gary Boldt	NRC Management Issues (Poole Report)	09/13/95 08/09/95	90% 90%
Paul Tanguay	Joe Maseda	Tank Levels and Volumes (other than MUT and BWST)	09/18/95 08/22/95	4% 2%
Gary Boldt	Roger Murgatroyd	Maintenance Rule Implementation	09/28/95 08/22/95	40% 10%
Paul Tanguay	Ron Bright	Mroczka Report Responses	09/25/95 08/09/95	95% 86%
Paul Tanguay	Don Porter	Low Pressure Turbines Replacement	09/21/95 08/08/95	On track for 10R

I. PURPOSE

To establish written guidelines for routine verbal communications between the United States Nuclear Regulatory Commission (NRC) and Florida Power Corporation (FPC) Nuclear Operations Department staff members. We believe the NRC's mission is complementary to our own and will strive to maximize the value added by the regulatory process.

II. SCOPE

A. This procedure applies to routine, non-emergency communications between FPC and the NRC, at all levels, on a frequency which is consistent with their direct involvement with Crystal River Unit 3 (CR-3).

This procedure is to be used with the following for other specific communication methodologies:

- NOD-03, Reporting Requirements Program, addresses written correspondence to the NRC.
- NOD-36, Employee Concerns Program, should be used for reporting employee concerns.
- NOD-52, Commitment Management, establishes guidelines for managing all commitments to the Nuclear Regulatory Commission (NRC) by Nuclear Operations.

III. APPROVAL AND REVISIONS

This procedure, in its entirety, shall be effective as of the issue date which may be found on the heading of each page of the procedure. Revisions shall be made in accordance with NOD-01, Preparation and Control of the Nuclear Operations Department Manual.

Approval: _____ Date: _____
P. M. Beard, Jr.
Senior Vice President, Nuclear Operations

IV. APPLICABLE REFERENCE DOCUMENTS

A. NOD-01, Preparation and Control of the Nuclear Operations Department Manual
B. NOD-03, Reporting Requirements Program
C. NOD-36, Employee Concerns Program
D. NOD-52, Commitment Management
E. Energy Reorganization Act of 1974, as amended
F. Atomic Energy Act
G. Code of Federal Regulations, Title 10

V. RESPONSIBILITIES AND ACTIONS

A. General

Florida Power Corporation employees are expected to communicate openly, honestly and professionally with the Nuclear Regulatory Commission (NRC) at all times. This will help assure that both proactive initiatives and developing issues are conveyed to and understood by the NRC at all levels of their management including the Commissioners. Such communication requires candor, thoroughness and clarity. Further, effective communication builds trust which can only be developed by consistently meeting expectations over time.

Communication effectiveness is increased by having the most knowledgeable individuals meet face-to-face. To assure this consistently happens Nuclear Licensing has been assigned the responsibility as the FPC focal point. The resident inspectors and the NRR Project Manager are the counterparts for the NRC. All meetings and significant communications should be coordinated through them. Other verbal communications with the NRC should be noted to the appropriate Licensing contact for follow-up and/or coordination with other departments.

B. Method

Recommended FPC / NRC counterparts and Region II Area Contacts are listed in Table 1.

1. ROUTINE INTERFACE

a. Commission

(1) Appropriate FPC management should visit a majority of the Commissioners at least once per year. Such meetings will often be associated with our participation in various coordinated activities (NEI, BWOG, etc.). These visits are aimed at becoming familiar with the position of the Commissioners on various issues as well as providing direct input to them on FPC's position on the issues. Significant events or major corporate changes may warrant additional visits.

(2) Invitations to visit CR-3 should be extended to all Commissioners by FPC's CEO or CR-3 Senior VP. Ideally, each commissioner would visit at least once during their term, or perhaps twice. This should generally result in one visit per year.

(3) The itinerary should generally include:

(a) Plant Tour and Training Center Tour

(b) Presentation of Key Initiatives/Programs

(c) Open Discussion

(d) Press Briefing (at Commissioner's discretion)

(4) Other FPC Directors and Managers should occasionally attend meetings of NRC Commissioners. Attending commission meetings provides developmental experiences. This should generally be arranged to coordinate with other business in Washington.

b. Senior Headquarters Staff

Senior Headquarters Staff members include Executive Director for Operations (EDO), Director, Office of Nuclear Reactor Regulations, Associate Director, Projects, Director, Division of Reactor Projects, Director Directorate II-2, and Project Manager. Refer to Table 1 for current position names. Visits by FPC Vice Presidents and Directors should be made to these individuals on a six to twelve month frequency. Consideration should be given to additional visits for special or significant events. Occasional telephone contact should be made between visits, particularly with the EDO, to discuss issues of specific regulatory interest.

c. NRR Projects

(1) The NRR Projects office is the primary interface between NRC Headquarters' staff and FPC. Daily telephone contact should occur between Nuclear Licensing and the Project Manager. Other regular telephone communication should take place between FPC Management (Vice Presidents and Directors) and NRR Project Manager and Associate Director. Routine business is normally handled by the Licensing Staff working with the Project Manager.

(2) Vice Presidents and Directors should make occasional visits coincident with visits to the Senior Staff or when on other business in the Washington area.

d. Region II

(1) General visits should be made 2-4 times per year, primarily to give status of the plant, update the Region on progress on internal initiatives, discuss FPC's position on industry programs and issues, identify other significant developments and provide candid discussions on any areas where there are weaknesses. This is an opportunity to get feedback from the Region Staff on CR-3.

(2) CR-3 Vice Presidents should communicate with the Regional Administrator or his deputy at least on a monthly basis. Generally, there are sufficient items of interest that can be discussed briefly to keep the channels open.

(3) NRC Division Directors should be focal points for FPC staff to provide more specific detail on issues affecting CR-3 and proactive initiatives of which the NRC should be informed. As upper middle management of the NRC, they are directly responsible for actions related to CR-3 as well as broader issues within the NRC. It is important that they have an accurate perception of CR-3 since they help develop region policy and also serve as the SALP board members.

(4) CR-3 Vice Presidents should visit the Division Directors at least once a year. The Directors should interface with their counterparts 2-4 times per year either by individual meetings at the regional office, by general meetings between FPC and the Region or by having them visit the site. These visits can be coordinated with other business activities in Atlanta. Nuclear Licensing will assist with the scheduling as needed.

e. Division of Projects

(1) The Division of Projects is the primary interface organization between FPC and the Region offices. The Director, Nuclear Site Support is the primary point of communication with the NRC Region II Branch Chief and will keep him informed of significant plant evolutions such as plant shutdowns, outage status and start up schedules. He will also notify him of unique problems and significant accomplishments.

(2) The Director, Nuclear Site Support and the Manager, Nuclear Licensing should visit the branch at least twice per year in addition to other meetings.

(3) Meetings with the Region should be scheduled whenever there is a significant event at CR-3. These meetings will be scheduled with consideration for timing impact. Meetings held at CR-3 are strongly encouraged to allow the Regional staff to view the plant and interface with a broader cross section of our staff.

(4) Area contacts have been established with the Region for each of the key functional areas within Nuclear Operations. The Area Managers for each of these areas should establish a working relationship with their designated NRC contact. This will facilitate frequent updates and information on what is going on in their area including the challenges they face. This should include phone contact, visits to Region II offices and Region II visits to the site. The purpose of these contacts is to help the Region II staff gain a broader perspective of the operations at CR-3.

f. Resident Inspectors

(1) The Resident Inspectors represent the NRC on site and provide the most frequent contact. All levels of FPC management from the CEO through the functional area managers should establish an effective working relationship with the residents. The residents should be invited to attend any key meetings on site.

(2) The Manager, Nuclear Licensing or his designee will coordinate with the residents daily to identify issues of concern, give them feedback on FPC actions and to provide access to documentation related to open issues.

g. Other Meetings

The Director, Nuclear Site Support and the Manager, Nuclear Licensing should hold meetings on a quarterly basis with the Director Directorate II-2 and the Project Manager to review overall performance and status of specific issues/actions. Meetings should alternate between CR-3 and Atlanta.

2. MEETINGS AND INSPECTIONS

a. Management Meetings

Management meetings with the NRC requested by FPC or the NRC are opportunities to convey an accurate perspective to the NRC and provide FPC's mid-level management personnel a chance to demonstrate their communication capabilities.

(1) All management meetings will be coordinated through Nuclear Licensing.

(2) An agenda should be prepared for each meeting and forwarded to the NRC for confirmation.

(3) The meetings should build on previous themes demonstrating progress or completion of various action or initiatives and to introduce new items of interest.

(4) All meetings should have thorough preparation involving all individuals who will attend. As a minimum the preparation should include:

(a) Initial meeting to discuss agenda topics and to establish generally what will be said and who will cover each area.

(b) A meeting shortly after the first to review preliminary presentations (overheads, outlines, and etc.) and make final adjustments.

(c) Dry run presentation with questions and critique.

(5) Additional dry runs may be scheduled to assure the best possible presentation.

(6) All overhead slides should be a consistent format and typed.

(7) All overheads and handouts must be given to the licensing staff at least three days prior to the meeting. Enough copies should be prepared to assure top level NRC representatives from both NRC Headquarters and Region receive copies.

b. Other NRC Requested Meetings

NRC requested meetings include pre-decisional enforcement conferences or meetings to discuss problem issues or serious events. It is extremely important, therefore, that FPC provide a well balanced presentation that puts the particular issue into proper perspective relative to the complex operation of a nuclear plant. The selection of attendees will be a key element of the presentation. Where possible, individuals directly involved or having direct responsibility should play major roles. Preparation should follow the same steps as management presentations above. FPC/Legal should be involved in all pre-decisional enforcement conferences.

c. Technical Meetings

Technical meetings will be arranged as necessary to support CR-3 Licensing actions. These are generally working meetings where FPC Technical and Licensing staff personnel meet with the appropriate NRC Technical branch personnel for detailed discussion on specific issues. Preparation for these meetings may be somewhat different than a FPC presentation although basic good practices for running a meeting should be followed and the most knowledgeable FPC personnel should participate.

d. Meeting Follow Up

For any meeting with the NRC, questions or areas of interest expressed by the NRC staff should be captured and any open items at the end of the meeting recorded. Prompt follow-up to these items should be taken. An individual should be designated to record items of interest and issue a meeting summary with follow-up actions assigned. Licensing staff members can assist in tracking significant actions through Nuclear Operations Tracking and Expediting System (NOTES).

e. NRC Inspections

Inspections by the NRC are part of our business. It is extremely important that the inspector or inspection team have a point of contact (Nuclear Licensing) to assist with the logistics of their visit and a technical point of contact (usually a functional area manager). A formal entrance and exit should be held for all inspections. These will be coordinated by Nuclear Licensing. The Directors and Managers of the areas being inspected are expected to attend. The individuals most familiar with the area being inspected should interface directly with the inspectors. Supervision should monitor the inspection to assure all the information is being presented and the proper perspective on the information is conveyed. Any issues raised should be raised up to higher levels of FPC management to allow actions to be taken to either promptly address a deficiency or to provide FPC management perspective. Open issues, follow up items and any violations will be identified during the NRC exit. Personnel responsible for the action on these items should be identified in an FPC debrief immediately following the exit.

VI. INTERPRETATION CONTACT

Director Nuclear Operations Site Support

TABLE 1

RECOMMENDED NRC / FPC COUNTERPARTS WITH CONTACT FREQUENCIES

NRC HQ STAFF	FPC COUNTERPART	FREQUENCY OF VISIT
NRC COMMISSIONERS	PRESIDENT & CHIEF EXECUTIVE OFFICER Allen Keesler, Jr. SENIOR VICE PRESIDENT NUCLEAR OPERATIONS Pat Beard	once per year "
EXECUTIVE DIRECTOR FOR OPERATIONS (EDO) Jim Taylor DIRECTOR, OFFICE OF NUCLEAR REACTOR REGULATIONS Bill Russell	PRESIDENT & CHIEF EXECUTIVE OFFICER Allen Keesler, Jr. SENIOR VICE PRESIDENT NUCLEAR OPERATIONS Pat Beard	once per year twice per year
ASSOCIATE DIRECTOR, PROJECTS Roy Zimmerman DIRECTOR, DIVISION OF REACTOR PROJECTS Steve Varga	SENIOR VICE PRESIDENT NUCLEAR OPERATIONS Pat Beard VICE PRESIDENT NUCLEAR PRODUCTION Gary Boldt	twice per year "
DIRECTOR DIRECTORATE ii-2 Dave Matthews PROJECT MANAGER "Rags" Raghavan	DIRECTOR, NUCLEAR OPERATIONS SITE SUPPORT Larry Kelley	once per quarter

NRC REGION II STAFF	FPC COUNTERPART	FREQUENCY OF VISIT
REGIONAL ADMINISTRATOR Stew Ebneter	PRESIDENT & CHIEF EXECUTIVE OFFICER Allen Keesler, Jr.	once per year
	SENIOR VICE PRESIDENT NUCLEAR OPERATIONS Pat Beard	"
DEPUTY REGIONAL ADMINISTRATOR Luis Reyes	SENIOR VICE PRESIDENT NUCLEAR OPERATIONS Pat Beard	2-4 times per year
	VICE PRESIDENT NUCLEAR PRODUCTION Gary Boldt	"
DIVISION DIRECTORS / DEPUTY DIVISION DIRECTORS:	SENIOR VICE PRESIDENT NUCLEAR OPERATIONS Pat Beard (all)	1-2 times per year
	VICE PRESIDENT NUCLEAR PRODUCTION Gary Boldt (all)	1-2 times per year
Ellis Merschoff / John Johnson	DIRECTOR, NUCLEAR PLANT OPERATIONS Bruce Hickle	2-4 times per year
	DIRECTOR, QUALITY PROGRAMS Paul McKee	"
	DIRECTOR, NUCLEAR OPERATIONS SITE SUPPORT Larry Kelley	"
Albert F. Gibson /	DIRECTOR, NUCLEAR PLANT OPERATIONS Bruce Hickle	"
	DIRECTOR, NUCLEAR ENGINEERING AND PROJECTS Paul Tanguay	"
	DIRECTOR, NUCLEAR OPERATIONS TRAINING Rolf Widell	"
	MANAGER, NUCLEAR PLANT TECHNICAL SUPPORT Jerry Campbell	"
Phillip Stohr / Bruce Mallett	DIRECTOR, NUCLEAR PLANT OPERATIONS Bruce Hickle	"
	DIRECTOR, NUCLEAR OPERATIONS SITE SUPPORT Larry Kelley	"

NRC REGION II STAFF	FPC DEPARTMENT	FREQUENCY OF VISIT
BRANCH CHIEF Kerry Landis	DIRECTOR, NUCLEAR OPERATIONS SITE SUPPORT Larry Kelley	2-4 times per year
RESIDENT INSPECTORS: Ross Butcher Todd Cooper	Directors Area Managers	weekly "
NRC REGION II AREA CONTACTS:		As Needed
Kerry Landis (404) 331-5509	Operations	
Tom Decker (404) 331-2559	Chemistry	
Bill Rankin (404) 331-5618	Radiation Protection	
Milton Shymlock (404) 331-5596	Maintenance	
Charles Casto (404) 331-5585	Engineering (Systems and Design)	
Dave McGuire (404) 331-5545	Security	
Ken Barr (404) 331-0535	Emergency Planning	
Sandy Lawyer (404) 331-4700	Training	

PROBLEM REPORT PR 95 - 198

PART 1A: INITIATION

Title: RB Sump Grating Clips Not Installed

Discovery Method:	Discovery Date:	Occurrence Date & Time:	Precursor Card Number
RB inspection	10/12/95	10/12/95	

Plant Condition:	Equipment Tag Number(s):
Mode I 57% power	none

Plant Location (Building)	(Elevation)	(Area/Room)
Reactor Building	95'	RB Sump

Description of the Condition/Event:

During a routine entry of the Reactor Building, a section (2'x3') of grating was discovered to be not physically secured as indicated by MAR 91-08-32-01.

Is this problem a Radiological Safety Concern?
[X] NO [ ] YES Immediately contact HP Supervisor for proper documentation.

Requirement(s) Violated:
Plant configuration must be as indicated by design drawing

Associated/Related Documents:
MAR 91-08-32-01 OCR DH-95-RBSump
WR 330987

Immediate Actions Taken:
Initiated OCR per CP-150

Originator: WK Bandhauer Date: 10/12/95

PART 1B: EVALUATION

This PR has been evaluated for operability (SSOD Signature): [signature] System/Train Safety Function Lost: None

[ ] KNOWN DBI [ ] SUSPECTED DBI [X] Not a DBI Severity Level: N/A

	NO	YES	
REPORTABLE:	X		Part 2 required if YES
TECHNICAL SPECIFICATION VIOLATION:	X		
UNPLANNED RELEASE:	X		

Recommendations for Resolving the Problem:
Install clips per design during Mode 5 outage or change requirement for clip installation

Recommended Responsible Organization: Maintenance Responsible Manager: R Davis

Shift Manager: WK Bandhauer PR Issue Date: 10/12/95

Operability Concern Resolution

Tag Number	Description
CR-3 RB Sump	RB Sump 1½" Grating Cover (≈ 2'x3')

OCR Number	Revision	Date
DH-95-RB Sump	Ø	10/12/95

Operations Immediate Disposition	[X] Conditionally Operable/ Potentially Inoperable [] Inoperable

Risk Level	[X]	Level 1
	[]	Level 2
	[]	level 3
	[]	level 4

Basis for Immediate Disposition:
*provide reasoning for decision regarding safest action for the plant
Conditionally operable based on:
(1) Specified retaining clips in MAR 91-08-32-01 are now Safety
(2) No driving force is present or predicted that could dislodge Grating
(considered Seismic, HELB, water flow to sump)
SSOD Desired Target Date/Time: 10/12/95/2400 PSAM Color: Red
Basis for Risk Level and Target Date/Time:
RB Sump is Common to both ECCS Trains. An inoperable RB Sump would result in loss of Safety function of DH System.

SSOD/Ops SRO J Depower	Date/Time 10/12/95/ 1511
Person(s) Providing Information Dan Topping / G Halnon	Phone 3445/ 3493

Risk Levels

Level 1: Potential to cause loss of safety function or may pose a challenge to systems used to protect TS safety limits. Evaluation is to proceed continuously until resolved.

Level 2: Safety-related equipment and equipment used to mitigate accidents by the EOP. Evaluation is to proceed continuously until resolved or, at management's discretion, on day shift through the weekends.

Level 3: Equipment important to safety and equipment used to mitigate transients in APs. Evaluation is to proceed continuously on day shift only, which may include weekends.

Level 4: Low safety significance based on low probability of event occurring, near incredible circumstances required, and events where the impact is low or procedures, training, personnel skills proven to compensate adequately. Evaluation is to proceed on normal day shift only and is expected to be continuous.

Operability Concerns Resolution Report Checklist

OCR Number DH-95-RB Sump	Revision 0	Date 10/12/95

Checklist:

1.0 **Description and Purpose**
- ☒ Abstract of the concern
- ☒ Circumstances of discovery described
- ☒ Component clearly described

2.0 **Safety Classification**
- ☒ Safety class described with basis document identified.

3.0 **Current Licensing Basis**
- ☒ Source document(s) identified where design basis is extracted
- ☒ If applicable, use NOCS and FULTEXT
- ☒ Applicable active OCRs are considered
- ☒ Current licensing basis is clearly understood

4.0 **Description of Identified Concern**
- ☒ Concern fully explained
- ☒ Impact on the operation and component function described
- ☒ Diagrams/figures attached if applicable

5.0 **Impact Analysis and Reliability Considerations**

5.1 Impact on Current Licensing Basis Accidents
- ☒ Impact of concern in Section 4.0 compared against each accident identified in Section 3.0.

5.2 Reliability Considerations of Component
- ☒ Mission time explained and analyzed

6.0 **PSA Evaluation**
- ☒ PSA numbers included (if applicable)

7.0 Operability Evaluation

Answer:
- ☒ "Can it still perform its function and how"?
- ☒ "What additional measures are required to enable this component to perform its function"?
- ☒ Extent of qualification described.
  - operable, fully qualified
  - ○ operable but degraded
  - inoperable, include Enclosure 4, Loss of safety Function Determination

8.0 Justification for Continued Operation
- ☒ Mode of plant operation
- ☒ Required compensatory measures
- ☒ Reasons justifying above

9.0 Corrective Action to Obtain Full Qualification
- ☒ What has to be done to obtain full qualification?
- ☒ When will it be accomplished?

10.0 References

11.0 Attachments and Figures

Report Writer WK Bachhawat	Date/Time 10/12/95 1819
NSM WK Bachhawat	Phone 3216

CRYSTAL RIVER UNIT 3

Operability Concern Resolution Evaluation Report

Tag Number	Description
not available	Reactor Building Grating

OCR Number	Revision	Date	PR Number
DH-95-RBSump	none	10/12/95	95-0196

10/12/95

Personnel Involved with Preparations

Print Name and Title	Signature
D. Jopling Sr Nuc Structural Eng	
D Jones, Nuclear Shift Supervisor	
Leon R. Crayne Assistant Nuc Shift Sup	
KENNETH R HARRINGTON NPTS/Systems	
PAUL V. FLEMING Sr Nuclear Licensing Eng.	

Approvals

Operations

Signature	Title	Date
	MNPU	10/12/95

Engineering

Signature	Title	Date
A. Petronstorf	Nuc Engr Design Supv	10/12/95

Licensing

Signature	Title	Date
	Sr Nuc Lic Eng	10/12/95

Plant Review Committee

PRC Mtg Number: Date:

PRC Chairman:

1.0 Description and purpose.

During a routine entry of the Reactor Building, a section (2'x3') of grating was discovered to not be physically secured as indicated by MAR 91-08-32-01. This MAR cut this particular grating to the present configuration.

Without the indicated clips installed, will the RB sump grating become dislodged and no longer assure that debris and material is prevented from entering the sump and thus, render the RB sump INOPERABLE?

2.0 Safety Classification

Clips and grating are non-safety related.

3.0 Current Licensing Basis

FSAR section 6.2.2.1 describes the function of the RB grating to prevent objects greater that 1 1/2" in size from entering the RB Sump which could clog or limit flow to pumps connected to the sump during a LOCA.

The Enhanced Design Basis Document does not address the RB Sump grating.

No active OCR's exist.

FPC has addressed a concern with extended operation of the LPI pumps at reduced flow due to elevated RCS pressure. A method to increase LPI pump flow rates was devised and incorporated into OP-404, "Decay Heat Removal System". This method opens an LPI pump suction line to the RB sump at/or below 100 psig in the RCS. This method was docketed to the NRC via 3F0892-06 and accepted by the NRC via 3N1092-12. In this position, FPC alleviated the concern of low decay heat flow through procedural actions in OP-404, section 4.12.

4.0 Description of Identified Concern.

If the RB sump grating became dislodged during a scenario addressed by the Current Licensing Basis, the sump components may be damaged rendering the ECCS inoperable.

5.0 Impact Analysis and Reliability Considerations

All accident scenarios evaluated in the FSAR, and other components of CR3's CLB were evaluated. Response from the ground motion acceleration is insufficient to overcome the dead weight of the grating. Adjacent grating and perimeter restaints prevent significant lateral motion. Two scenarios were discovered which could potentially dislodge the grating.

The first scenario involves swapping suction for the ECCS to the RB sump from the BWST.

The second scenario involves reducing RCS pressure to increase LPI flow. This is accomplished by lining up the decay heat drop line to the RB sump.

In both cases volumetric flowrates do not result in sufficient force to dislodge the grating. The attached calculation supports the first scenario. Through engineering judgement, the second scenario does not provide the flowrate necessary to dislodge the grating. Engineering judgement considered the weight of the grating (10.6 psf) with the required flow to obtain the same force. The flowrate required was determined to be over 3 million gallons per minute into the sump which is not credible.

6.0 PSA Evaluation

The PSAM color for loss of the RB sump is RED. This supports the Risk Level 1 evaluation. PSA does not address the function of the clips.

7.0 Operability Evaluation

The RB Sump grating is determined to be Operable, but Degraded. The reason is that the MAR required the clips to be installed and SP-175, step 4.5.1 inspects fc all nuts and bolts to be installed. From an operability standpoint, there is no degradation although, for industrial saety reasons, the clips should be installed.

By proving the grating cannot be dislodged by the identified scenarios, the absence of the hold down clips is not an operability issue. No comppensatory measures are required.

8.0 Justification for Continued Operation

The Operable but Degraded evaluation does not require a JCO since the degradation is not related to the safety function.

9.0 Corrective Action to Obtain Full Qualification

To restore full qualification, it is necessary to install the hold down clips. This will ensure industrial safety is maintained. Work Request 330987 has been written to cover this installation. This will be completed during a future Mode 5 outage.

10.0 References

FSAR Section 6.2.2.1
FPC Letter 3F0892-06
NRC Letter 3N1092-12
MAR 91-08-32-01
ITS 3.5.2, SR 3.5.2.7
EBDB Chapter on DH
SP-175

RB SUMP GRATING LIFT

Florida Power CORPORATION

DESIGN ANALYSIS/CALCULATION

Crystal River Unit 3

Sheet 1 of 1

DOCUMENT IDENTIFICATION NUMBER	REVISION	REV/MAR/SP NUMBER/FILE

BELOW IS A CONSERVATIVE METHOD TO ESTIMATE UPLIFT ON GRATING.

PER CALC M95-0005 REV. 1 THE MAXIMUM FLOW INTO THE RB SUMP DUE TO DRAINING THE BWST IS 5825 GPM.

THE GRATING AREA IS 10' x 5'6" PER DWG 521-038

PER McMASTER CARR CATALOG DATA, THE GRATING WEIGHS 10.6 LBS PER SQ. FT. THE GRATING IS 1 1/2" x 3/16" GRATING. THUS, THE OPEN AREA IS APPROXIMATELY 78% OF THE TOTAL 55 SQ. FT.

THE VELOCITY OF WATER CAN BE CALCULATED AS:

$$\frac{(5825\ \text{GPM})(2.228\times10^{-3}\ \frac{\text{FT}^3}{\text{SEC}\cdot\text{GPM}})}{55\ \text{FT}^2\ (.78)} = .30\ \text{FT/SEC}$$

THE STAGNATION PRESSURE CAN BE CALCULATED (FROM BERNOULLI) AS:

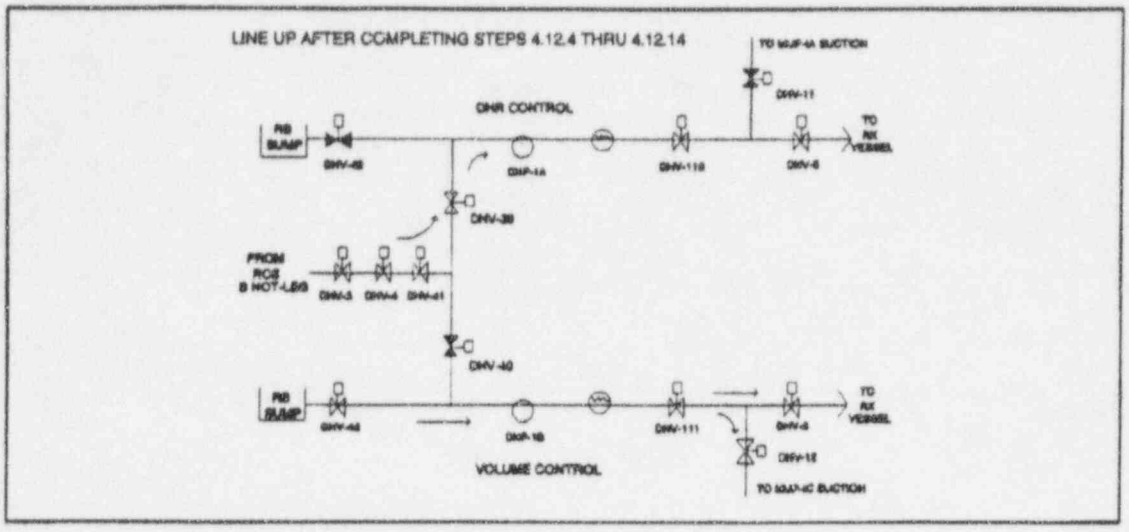
$$\frac{(.30\ \text{FT/SEC})^2\ (62.4\ \text{LB/FT}^3)}{2\ (32.2\ \text{FT/SEC}^2)} = .09\ \frac{\text{LB}}{\text{FT}^2}\left(.22\ \frac{\text{FT}^2\ \text{METAL}}{\text{FT}^2\ \text{GRATING}}\right) = .02\ \frac{\text{LB}}{\text{FT}^2\ \text{GRATING}}$$

SINCE THE GRATING WEIGHS 10.6 $\frac{\text{LBS}}{\text{FT}^2}$ THE FORCE OF THE WATER WILL NOT MOVE THE GRATING.

Richard Jackson 10/12/95
DESIGN ENGR.

[signature] 10/12/95
VERIFICATION ENGR.

ACTIONS	3	DETAILS



4.12.4	IF DHP-1B is providing suction to HPI pumps, THEN ensure the MUP suction flow path is properly aligned	o ___	OPEN/Ensure OPEN the following:
		o ___	DHV-12
		o ___	MUV-62
		o ___	MUV-69

_____/_____
Initial/Date

****

CAUTION: IF LPI is providing suction to MUP(s), THEN MUP amps and flow should be carefully monitored while securing a DH pump.

****

4.12.5 Stop DHP-1A

_____/_____
Initial/Date

4.12.6	Ensure DH cooler is properly aligned for Decay Heat Removal Operation	o ___	Refer to Step 4.5.1.6

_____/_____
Initial/Date

ACTIONS	3	DETAILS

NOTE: The following step is to protect DHP-1B and should be performed at the lowest possible RCS pressure but MUST be performed prior to exceeding 10 hrs of operating DHP-1B in the restricted flow region (Indicated flow <1400 gpm).

4.12.15 Reduce RCS pressure to ≤ 100 PSIG

- o Reduce RCS pressure in the following order:
  1. ___ IF PZR bubble exists THEN use PZR AUX spray
     IF RCS pressure ≤ 100 PSIG, THEN GO TO Step 4.12.16
  2. ___ Reduce operating HPI pumps to one
     IF RCS pressure ≤ 100 PSIG, THEN GO TO Step 4.12.16
  3. ___ Throttle HPI flow
     IF RCS pressure ≤ 100 PSIG, THEN GO TO Step 4.12.16
  4. ___ OPEN PORV
     IF RCS pressure ≤ 100 PSIG, THEN GO TO Step 4.12.16

_____/_____
Initial/Date