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**Florida
Power**
CORPORATION

June 29, 1984
3F0684-17

Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 84-14

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report. With regard to the information requested in Section 5.B(2) of the report, the inspector's concern regarding the difference between code limits and SP-3'0 pump test alert and action range limits was valid. After researching records, no justification could be found for this difference. A procedure change has been initiated to bring the limits into line with Section XI Criteria by October 30, 1984.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Attachment

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PDR ADDCK 05000302
Q PDR

INSPECTION REPORT 84-14

VIOLATION

Technical Specification 4.0.5 and 10 CFR 50.55a(g) require that the licensee comply with the ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition with Addenda through Summer 1975, for testing pumps and valves. Subsection IWP-6210 and IWV-6210 of this Code require the licensee to maintain summary listings of pumps and valves to display the current status of the test program. For pumps, the Code states that when all quantities measured during a test are within the acceptable range of Table IWP-3100-2 only the date of each successful test shall be listed.

Contrary to the above, the licensee did not maintain the summary status listings required by the code.

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

RESPONSE

Florida Power Corporation Position

Florida Power Corporation agrees with the stated violation in that we do not maintain the summary status listing which meets literal code requirements. However, FPC does maintain a record keeping system and is awaiting NRC approval of the Pump and Valve Program prior to initiating further changes.

Apparent Cause

The Inspector did not accept the Florida Power Corporation record keeping program as being a summary listing. A planned upgrade of our Inservice Testing Program (IST), including the listing, has been delayed awaiting NRC action on the submitted Pump and Valve Program for CR-3.

Corrective Action

An enhanced program is being developed that will be available in the Control Room. It will more fully meet the requirements of Subsection IWP-6210 and IWV-6210.

Corrective Action To Prevent Recurrence

Florida Power is actively working with NRC/ONRR to develop, review and approve an ISI/IST program. This effort will result in a much more efficient and effective program for complying with ASME Boiler and Pressure Vessel Code Section XI requirements.

Date Of Full Compliance

The enhanced program is scheduled to be implemented by October 31, 1984.