

NOTICE OF DEVIATION

Florida Power Corporation
Crystal River Unit 3

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

During an NRC inspection conducted on August 6, 1995, through September 16, 1995, a deviation from written commitments was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (NRC Enforcement Policy) (60 FR 34381, June 30, 1995/NUREG-1600), the deviation is listed below:

NUREG-0737, Clarification of TMI Action Plan Requirements, Supplement 1, item III.A.1.2, Upgrade Emergency Support Facilities, requires (in part) that each facility shall have a Technical Support Center (TSC) which will be habitable to the same degree as the control room for postulated accident conditions.

In response to item III.A.1.2, in a letter to the NRC dated January 11, 1980, the licensee committed to providing protection from radiological hazards, including direct radiation and airborne contaminants as per General Design Criterion (GDC) 19 and Standard Review Plan (SRP) 6.4 for the technical support center.

In response to Generic Letter 81-10, Post-TMI Requirements for the Emergency Operations Facility, the licensee's letter to the NRC, dated April 14, 1981, stated that the TSC would be functional per the guidance of NUREG-0696 and NUREG-0737 (Item III.A.1.2).

NUREG-0696, Functional Criteria for Emergency Response Facilities, Section 2.6, Habitability, states (in part) the following:

Since the TSC is to provide direct management and technical support to the control room during an accident, it shall have the same radiological habitability as the control room under accident conditions. TSC personnel shall be protected from radiological hazards, including direct radiation and airborne radioactivity from inplant sources under accident conditions, to the same degree as control room personnel.

The TSC ventilation system shall function in a manner comparable to the control room ventilation system. The TSC ventilation system need not be seismic category I qualified, redundant, instrumented in the control room, or automatically activated to fulfill its role. A TSC ventilation system that includes high-efficiency particulate air (HEPA) and charcoal filters is needed, as a minimum.

Acceptance Criteria in SRP 6.4 includes meeting the requirements of GDC 19, as it relates to maintaining the control room in a safe, habitable condition under accident conditions by providing adequate protection against radiation. The "Licensee Enhanced Design Base Document" states, in part, "The TSC air handling system emergency filter Fan ASH-62 design flow requirement is 3000 cfm."

Enclosure 2

Contrary to the above, on August 18, 1995, the licensee determined that the TSC ventilation system had not been maintained per their commitments. Specifically, the proper flow balance was not maintained on the system, resulting in a high flow rate of 4600 cfm in the emergency (recirculation) mode of operation versus the design flow rate of 3000 cfm, degrading the performance of the ventilation filtration system. This caused the TSC ventilation system to be operating outside of its design basis since July 1994.

Please provide to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and if applicable, a copy to the NRC Resident Inspector, in writing within 30 days of the date of this Notice, the reasons for the deviation, the corrective steps which have been taken and the results achieved, the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 13 day of Oct 1995