Florida Power
CORPORATION

April 13, 1992

Crystal River Unit 3
Docket No. 50-302

3F0492-06

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

Subject: NRC letter to FPC dated February 13, 1992
Inspection Report 92-01 (3N0292-07)

Dear Sir:

On January 6 thru January 10, 1992, the NRC conducted a Motor-Operated Valve (MOV) inspection at Crystal River Unit 3 (CR-3). The inspection consisted of a review of the MOV program Florida Power Corporation (FPC) developed in response to Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance". Although the inspectors found that the Generic Letter 89-10 MOV program for CR-3 was generally satisfactory, there were some concerns identified. FPC has attached our response to the two concerns as requested in the subject letter.

FPC was also requested during the MOV inspection to submit an update to the previous MOV submittal concerning implementation and scheduling for the MOV program. FPC agrees that a revised response is warranted for the reasons noted and in response to evolving industry MOV concerns. We have just received the draft NUMARC guidelines and are incorporating them as well as direct input from ITI MOVATS and our own experience into a revised program. Further, FPC anticipates lessons learned during the upcoming Refuel 8 outage will aid us in developing such a response. Therefore, FPC will submit an updated submittal sixty days after startup from Refuel 8. As noted in the attached response to Concern 2, the scope of the program is being significantly expanded. It is therefore likely that the schedule will be affected. We will provide a new schedule in our updated submittal.

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FPC notes that the inspection team and the associated report regularly refer to "the requirements of Generic Letter 89-10". This is inappropriate since such generic correspondence is not the proper vehicle to impose requirements. FPC's MOV program is and remains our plan to deal with MOV issues raised by the NRC, vendor input, our experience, etc. We will continue to relate it to the suggested actions in the generic letters, NUMARC guidelines, or other appropriate references but we do not consider these to be requirements.

Sincerely,

P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

GMF:mag

Att.

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

FLORIDA POWER CORPORATION RESPONSE
NRC INSPECTION REPORT 92-01
NOTICE OF CONCERNS

CONCERN (1)

Based on the status of calculations and development of procedures, there was a concern that resource allocation might be insufficient to complete the program on schedule. Licensee personnel indicated there were plans to increase the engineering support to the program.

FLORIDA POWER CORPORATION RESPONSE

FPC has dedicated resources to the Crystal River Unit 3 (CR-3) Motor Operated Valve (MOV) program during 1992 in addition to the "MOV Engineer" previously assigned to the program. The following is a listing of these additional resources.

1. A Mechanical Engineer has been assigned to support the MOV Program. Initial responsibilities include writing Performance Test procedures for the Differential Pressure Tests. Training in Data Acquisition, Diagnostic Equipment Usage and Signature Analysis will be accomplished in 1992 to provide additional plant MOV Diagnostic Testing engineering support.

2. Various system engineers are being utilized to perform the calculations for maximum Differential Pressure (DP) determinations for the MOVs. This is a major project (Item "A" of the Generic Letter 89-10), and is being divided among several engineers according to their assigned systems.

3. An Engineering Aide will provide additional administrative support for processing Operability Assessment and Limiter Plate Calculations.

4. A consultant from ITI MOVATS will provide supplemental manpower to the MOV Program for 1992. This contract employee will be stationed at CR-3 on a full time basis during 1992.

5. The maintenance department has devoted more manpower to program implementation. The Reliability Centered Maintenance (RCM) group is now responsible for implementation of the DP tests in the field. In the future, the RCM group will be capable of performing the verification of

the signatures. These changes will allow the MOV Engineer increasingly more time to address technical and programmatic issues.

6. A senior management MOV Program Oversight Team has been established to monitor progress and assure coordination in implementation of the program.

CONCERN (2)

A listing of valves scheduled to be design-basis tested revealed that it would be acceptable to test either valve of listed similar pairs rather than test both. This is contrary to recommended action of GL 89-10, which indicated that each valve should be tested at design-basis pressure where practicable. This was further explained in the reply to Question 22 of GL 89-10, Supplement 1.

FLORIDA POWER CORPORATION RESPONSE

FPC has evaluated our program and concluded that expanding the program is indeed warranted. Crystal River will DP test all MOVs which are practicable to test. Valves which can be tested in place without jeopardizing operation or availability of safety-related systems or components will be DP tested. It must be noted that this additional DP testing will nearly double the scope of work previously planned.