

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 90-302

December 13, 1995
3F1295-14

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

Subject: NRC Systematic Assessment of Licensee Performance (SALP)

References: A. NRC to FPC letter, 3N1095-18, dated October 20, 1995
(SALP Inspection Report 50-302/95-99)
B. NRC to FPC letter, 3N1195-06, dated November 8, 1995
(Meeting Summary - SALP Presentation)

Dear Sir:

In References A and B, as well as the Crystal River site public meeting of October 31, 1995, the Nuclear Regulatory Commission (NRC) presented the results of the SALP evaluation for Florida Power Corporation's (FPC) Crystal River 3 (CR-3). The purpose of this letter is to convey our acceptance of those results and our commitment to address the issues noted.

We particularly acknowledge the following areas of weakness discussed in the SALP:

- Management oversight and involvement in day to day operations.

Additional management attention has been given to oversight of problem identification and resolution through revisions made to our Precursor Card and Problem Reporting Program (CP-111) and the Operability Determination Program (CP-150). We have also recently combined Design Engineering (and moved this function to the Crystal River site) with System Engineering and placed reporting of both functions within the same chain of command as plant operations. We have placed a number of key issues on a focus list with the assignment of an issue sponsor and issue manager for each. Significant issues will be monitored in

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accordance with newly clarified management expectations for issue managers and sponsors. Emphasis will be placed on aggressive identification of root cause and resolution of problems for the long term.

- Vertical communications and teamwork between Engineering, Operations and Maintenance.

Continued attention will be placed on improving communication and teamwork among all groups, both vertically and horizontally. Integration of Design and System Engineering as well as their interfaces with Operations, Maintenance, and Licensing will receive particular focus with a specific action plan being developed along with incentive goals for the affected mid-level managers. Routine meetings of all mid-level managers now occur at a frequency of once to twice per month to share information, priorities and goals among groups.

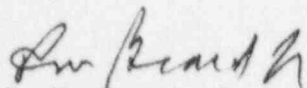
- Self assessment and aggressive focused effort by the line organization to identify and resolve problems.

Several new self assessment efforts were initiated in 1995. A quarterly mid-level manager assessment is performed and documented. These quarterly assessments are then input to a senior management self assessment conducted semi-annually. Management Review Panels (MRP) are held to investigate actual or potential regulatory violations so that information and questions can be discussed by senior plant managers directly with the responsible workers on the scene. This and other self assessment initiatives will be described in a revision to NOD-45 "Management Self Assessments and Performance Monitoring".

Many of our management efforts to address the issues noted above are reflected in the Corrective Action Plan (that included our Event Free Operations program) which you have previously reviewed and acknowledged in the SALP as effecting some performance improvement. These efforts will be further expressed in our revised Long Range Plan for Excellence and our 1996 Annual Plan.

In summary, we appreciate the insights from the SALP evaluation and will strive to use them in the best way to achieve continuing improvement in overall nuclear safety performance at Crystal River 3.

Sincerely,



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

PMB/RLM:ff

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