

**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

May 6, 1992
3F0592-05

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

Subject: NRC letter to FPC dated December 11, 1991
Inspection Report 50-302/91-22 (3N1291-06)

Dear Sir:

The purpose of this correspondence is to communicate information relative to the content of NRC Inspection Report No. 50-302/91-22. This inspection report documents an unannounced inspection of Crystal River Unit 3's Radiation Protection Program by Mr. E. D. Testa on November 4 through 8, 1991. No formal response to the inspection report was required. However, further review by Florida Power Corporation (FPC) has determined that certain statements in the report warrant comment.

Section 2 of the report, "Audits and Appraisals," states that "The one substantive RP [Radiation Protection] finding was in the form of a recommendation that focused on the need to establish an aggressive ALARA program. However, the basis for the recommendation was not documented in the observation section of the report. Field notes and audit guidelines had to be utilized to determine what was observed and concluded by the auditor." As discussed with Mr. Testa during the inspection, the referenced report provides a summary of FPC audit 91-05 and is considered to be only one part of a comprehensive audit package. The audit checklist and other documentation contained within the package provide substantiation of audit scope and investigative activities. To obtain a complete understanding of the audit, the entire package should be reviewed to identify all pertinent information associated with a specific area of concern. As a result of Mr. Testa's comments and other similar feedback, we have recently modified the format of our audit reports to provide more detail. Inclusion of substantiating information with each finding and recommendation is emphasized.

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Another concern identified in Inspection Report 91-22 states that "A review of the licensee auditor's credentials showed that he was qualified in engineering disciplines but lacked health physics protection qualifications." It is not clear from the same section of the report which auditor's credentials were reviewed; however, FPC procedure

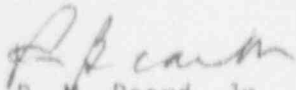
QAP-5, "Audit Program Planning and Scheduling," requires the Supervisor, Quality Audits, to assure that the Audit Team, composed of the Team Leader, Team Members, and Technical Advisor(s), collectively possesses the technical expertise necessary to perform an in-depth evaluation of its assigned audit area. This procedural requirement conforms with our Quality Assurance Program and applicable NRC and ANSI guidance. For this audit, the team consisted of a certified team leader, four team members who were lead-auditor certified, two team members who were auditors, and a technical advisor. The technical advisor possesses over twenty years experience in the nuclear power generating field with utility program management and consulting experience relating to radiation protection, chemistry, radwaste, emergency planning, and nuclear fuel management. His educational credentials include a B.S. in Chemistry, M.S. in Nuclear Engineering, and certification as a Power Reactor Health Physicist by the American Board of Health Physics. We firmly believe that, collectively, the Audit Team possessed the appropriate education, experience, and technical expertise to responsibly perform the audit.

The section further states: "A review of the RPR's [Radiation Protection Problem Report] showed that in 1991, the licensee averaged one RPR a month. The inspector determined that this was too small a number to either identify an adverse trend in performance or allow sufficient management oversight in assessing the RP program. Overall, the licensee's self-assessment program was not identifying, trending, and correcting deficiencies." This viewpoint is highlighted in the inspection report summary where it is stated that audits and self-appraisals need improvement to identify and trend program deficiencies. These comments present "broad brush" criticism of our self-assessment capability, which appear to be based on relatively limited information concerning our performance monitoring activities. The Radiation Protection problem report system and quality assurance audits are not the only assessment and performance monitoring activities associated with the Radiation Protection program. Additionally, various performance indicators have been developed such as Skin and Clothing Contamination Reports, Radiological Tracking Reports (lower tier documentation of radiological deficiencies which may result in initiation of an RPPR as determined by the Radiation Protection Manager), Pre- and Post-Job ALARA Reviews, and Radiation Exposure Reports. These reports are tracked and evaluated. Evaluations are periodically provided to both management and the corporate health physicist as an overview of the RP program.

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Notwithstanding the above, we have re-evaluated the scope and sensitivity of our trending programs and recognize that some performance data can be used more effectively to detect adverse trends and precursors to larger problems. We are in the process of implementing enhancements which will improve our capabilities in this area.

Sincerely,



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

REF:meg

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