

**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302

May 14, 1992

3F0592-02

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20545

Subject: Change to Quality Program Description - Procedure Review

Dear Sir:

In accordance with 10 CFR 50.54(a)(3), Florida Power Corporation (FPC) is submitting for NRC approval a proposed change to the Crystal River Unit 3 (CR-3) Quality Program Description (FSAR Section 1.7). FPC proposes to reduce the Quality Program commitment to comply with Regulatory Guide 1.33, Revision 2 for the two-year review cycle for procedures. The proposal was evaluated as involving a reduction in commitment because some procedures may not be reviewed within a two year period.

FPC's evaluation of this change in Quality Program commitments is provided as an attachment to this letter. The programs described in Evaluation Item 4, Basis for Determination, contain provisions to assure that the CR-3 Emergency Operating Procedures [Emergency Procedures (EP), Abnormal Procedures (AP), Verification Procedures (VP), etc.] are revised when necessary. Experience has shown FPC that these programs result in reviews more frequently than every two years.

The programs discussed in the attachment contain review that will assure that necessary changes are incorporated into plant procedures. Quality Assurance Program (QAP) audits conducted throughout the year assess procedural adequacy or the effectiveness of the procedure revision process. No single audit is relied on to assess this process for all Nuclear Operations Department organizations.

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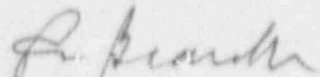
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As required by the regulations, FPC is attaching to this letter all FSAR pages affected by this change, and the reasons for this change. The established management controls for CR-3 described in the attachment lead FPC to conclude that the revised program incorporating the change continues to satisfy the criteria of 10 CFR 50, Appendix B.

sincerely,



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

PMB/JWT

Attachment

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

PROPOSED CHANGE TO THE QUALITY PROGRAM DESCRIPTION
FSAR SECTION 1.7

1. Description of Proposed Change:

Clarification 33 to FSAR Table 1.3 was added to describe Florida Power Corporation's (FPC) interpretation of ANSI N18.7-1976, Section 5.2.15 regarding the frequency of procedure review. This revised guidance eliminates the two-year review cycle for procedures.

2. Reason for the Proposed Change:

This change will allow a more effective allocation of plant resources. Rather than review procedures which are used infrequently, or which are not likely to be used in the near term, simply to satisfy a two-year review cycle, plant resources can be more focused on supporting planned activities and addressing current problems.

This change more clearly defines our program and expectations for procedure reviews. Maintaining procedures in an accurate and useful condition is a dynamic process. The need for change may be identified at various times for various reasons. Requiring a static review process, in addition, is unnecessary and may be counterproductive.

3. The Proposed Change does involve a reduction in a FPC Regulatory Commitment in that some procedures may not be reviewed within a two-year period.

4. Basis for the Acceptability of the Reduction:

FPC has established explicit management guidance on procedure changes. This guidance includes a requirement that if the activity cannot be performed in accordance with the procedure, or the procedure governing the activity should not be followed, the activity must be stopped pending a procedure revision or supervisory guidance.

In addition, various other management controls exist which require knowledgeable personnel to review and modify plant procedures. Some examples are:

1. The plant modification program requires a review of the proposed modification by affected groups. This review requires identification of procedures needing revision to support a return of the system to operable status. Such changes must be made concurrent with modification implementation and are carefully tracked as part of the modification process.
2. The corrective action program requires root causes for significant problems be determined and corrective action implemented. Review of affected procedures and subsequent revision, if needed, is an integral part of the corrective action process.

3. The operating experience review program includes reviews of items such as NRC regulatory changes, bulletins and notices, generic letters, and INPO Significant Event Reports, Significant Operating Event Reports and other NETWORK communiques for applicability and action. Actions include procedure revisions when appropriate.
4. Vendor bulletins, technical manual changes and notices are also evaluated for applicability and actions. Actions include procedure revisions when appropriate.
5. Evaluation of changes to the License, Technical Specifications, FSAR, or Quality Program includes identification of the need to revise procedures. If necessary, such procedure changes are issued concurrent with the source document revision.
6. Corrective actions for NRC inspections provide another opportunity for the evaluation and revision of procedures as necessary.
7. The procedure change process assures that reviewers from interfacing departments affected by procedure changes are assigned as interdisciplinary Qualified Reviewers. This process assures related procedures are updated concurrently.
8. The Qualified Reviewer program assures that all procedures applicable to Regulatory Guide 1.33, November, 1972, are reviewed by personnel who have been formally trained and certified. Recurring training provides needed updates when changes dictate.
9. The Nuclear Operations Commitment System (NOCS) is used to track commitments and the procedures developed to implement those commitments. A step in the NOCS process requires a review of all procedures referenced in the NOCS database against a particular commitment. This process assures that a commitment change is reflected in plant procedures in a timely manner.

FSAR SECTION 1.7 TEXT CHANGES

NRC Regulatory Guide 1.33 (Continued)

- 27) With regard to Section 5.3.9.3 of ANSI N18.7 - 1976 titled Procedures for Implementing Emergency Plan: FPC's NRC accepted Emergency Plan for Crystal River Unit 3 shall be implemented in lieu of the requirements in this Section.
- 28) Paragraph C.1 and Appendix A of Regulatory Guide 1.33 shall be implemented as required by the Crystal River Unit 3 Technical Specification 6.8.a.1, "Procedures."
- 29) With regard to Section 3.4.2 of ANSI N18.7-1976 titled Requirements for the Onsite Operating Organizations: Some of FPC's technical support organizations are physically located at the CR-3 site. Therefore, the second sentence of this section shall be implemented as follows: "Initial incumbents or replacements for members of the onsite operating organization and onsite or offsite technical support organizations shall have appropriate experience, training, and retraining to assure that necessary competence is maintained in accordance with the provisions of American National Standard for Selection and Training of Nuclear Power Plant Personnel, N18.7-1971".

For purposes of implementing Section 3.4.2 as clarified above, FPC also defines the FPC Relay Department Technicians who may perform safety-related activities at CR-3 to be members of an offsite technical support organization.

- 30) With regard to Section 5.2.19.1 of ANSI N18.7-1976 titled Pre-operational Tests: This section will only apply in the event of major modification activities which are similar in nature and extent to those activities that occurred during initial construction of CR-3.
- 31) With regard to Section 5.2.19.2 of ANSI N18.7-1976 titled Tests Prior To And During Initial Plant Operation: This period of operation has already passed and therefore this section is not applicable.
- 32) With regard to Section 2.2 of ANSI N18.7-1976 titled Glossary of Terms: Definitions in this Standard which are not included in ANSI N45.2.10 shall be used. All definitions which are included in ANSI N45.2.10 shall be used as clarified in FPC's commitment to Regulatory Guide 1.74. The term "onsite operating organization," defined in general terms in this Standard, shall be synonymous with "Facility Staff" which is defined in FPC's commitment to Regulatory Guide 1.74.
- 33) With regard to Section 5.2.15 of ANSI 18.7-1976 titled Review, Approval and Control of Procedures; in lieu of wording starting with the second sentence in the third paragraph of this section; beginning with "The frequency of

..., " through the end of the fourth paragraph, which ends "... a procedure review.", FPC provides the following alternative guidance:

"Procedures shall be revised as necessary. These revisions will generally be initiated through reviews conducted by personnel during routine performance of activities. Example of such reviews include evaluations of problems encountered during performance of a procedure, evaluation of corrective actions for deficiencies or events, evaluation of events occurring at other plants, evaluation of procedure changes necessary to implement modifications, evaluation of procedure changes necessary to implement License, Technical Specification, or FSAR revisions as well as evaluations of changes necessary to resolve Regulatory Issues. Such changes shall be implemented as necessary. In some situations, such implementation will be completed prior to completion of the in-process activity. Guidance on the need to revise procedures shall be provided in plant administrative controls