

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

February 1, 1996
3F0296-02

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

Subject: EOP Enhancements

Dear Sir:

The purpose of this correspondence is to inform you of our current and near-term activities that further enhance the effectiveness of our EOPs. We continue to believe our EOPs are adequate and significantly improved over previous revisions; however, our previous efforts have not always met either our or your expectations. A number of inspections and reviews have been done by your staff and the results have been mixed. Your 1993 inspection (No. 93-16) identified substantial shortcomings in the administrative controls of our EOP change control process and its implementation. In our response to Inspection Report 93-16 we outlined a significant corrective action plan that has evolved over the months as we gained greater insight in how we might improve the quality and technical basis of our EOPs. Therefore, we are focussing a very tough, questioning attitude on both their detailed content and use. Your staff has been periodically briefed on these efforts and the progress made to-date. This correspondence briefly outlines where we have been and Attachment 1 provides considerable details on our near-term plans.

Recently we have better balanced the insight and independence of NSSS personnel with our own perspectives. We are also working with the other B&W Owners to gain greater consistency. As an example, the B&W Owners are validating the B&WOG generic technical guidelines (which we refer to as the Generic Emergency Operating Guidelines (GEOG) and the associated Technical Bases Document (TBD)) on the CR-3 plant-specific simulator. These efforts, and the resolution of some other technical issues will result in further improvements to the GEOG and TBD.

Following the December, 1993 inspection; documented in Inspection Report 93-16, we have taken the following major steps:

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- 1) We completed a "deviation document" that outlines differences from and additions to the "vendor-preferred" strategies. Safety significant differences have been justified in accordance with our program requirements. There is currently only one such deviation. We also developed a detailed comparison of each step noting differences between the content of our EOP's and the GEOG on a step-by-step level.
- 2) We also completed a detailed review against the Writers Guide. Items from punctuation to more substantial items were identified. Some changes to the guide were made where that was more appropriate. Other items are being integrated into EOP changes as the process moves forward.
- 3) Each EOP has been assessed by a multi-disciplined team comprised of Operations, Engineering (design, systems and EQ), Training, Licensing and BWNT personnel. No significant safety concerns were identified although a number of improvements to both the TBD and our EOPs were identified. They also reviewed each step and setpoint to identify those where adequate technical basis was not readily retrievable. Implementation of the attached plan will provide a more appropriate and readily retrievable technical basis for each step and setpoint.
- 4) Opportunities for EOP enhancements have been identified through various verification and validation efforts, the resolution of some EOP related technical issues, the enhanced interface with the other Owners and BWNT and routine feedback from the in-plant review or simulator review and use. The technical changes and other open items noted in Item 2 above will be factored into a comprehensive revision to our EOPs. Some of the engineering reviews described in the attached plan may not be completed in a time frame to support the comprehensive EOP revisions and will have to be dealt with as subsequent improvements. If interim guidance is warranted it will be established in a timely manner regardless of whether it is identified before or after the comprehensive changes are made.

As described and depicted in the attachment, a significant EOP improvement effort is being undertaken. The EOP changes already identified will be developed in the next few months. The development of these integrated revisions, including the verification and validation, will be accomplished in parallel to the Engineering effort to retrieve and validate the basis for the steps and setpoints. The revised EOPs are scheduled to be implemented in the Fall of 1996.

Sincerely,



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

PMB/KRW:ff

Attachment

xc: Regional Administrator, Region II
Senior Resident Inspector

NRR Project Manager

ATTACHMENT 1

EMERGENCY OPERATING PROCEDURES ONGOING ENHANCEMENT PROGRAM DESCRIPTION

SCOPE

Enhance CR-3's Emergency Operating Procedures (EOPs) by:

1. Performing an engineering review of appropriate setpoints and plant specific steps used in the EOPs and documenting the bases for both. This review will consider instrument accuracy, design adequacy, and other design considerations of these steps and setpoints. "Appropriate" steps and setpoints were identified during the Safety Assessment recently completed.
2. Developing comprehensive EOP revisions to incorporate the results of the setpoint and step review as well as applicable comments from the "open items" list.

OBJECTIVES

As described in the cover letter, CR-3's EOPs have undergone significant changes and improvements in the last several years. These improvements included those done in response to the concerns identified in NRC Inspection Report 93-16. The corrective actions completed in response to the deficiencies identified in this inspection included development of a CR-3 specific cross-step document which has become an integral part of the Plant Specific Technical Guideline (PSTG). The cross-step document identifies those steps that differ between the BWO generic guidelines and the CR-3 EOPs.

Recent problem reports have revealed weaknesses in some assumptions used to generate plant specific EOP steps. As a result, two broad areas of additional enhancements are being pursued. These are:

1. Setpoint basis/instrument accuracy, and
2. Plant specific step basis documentation.

The current cross step document contains reasons for plant specific steps but does not provide a detailed basis demonstrating the acceptability of performing the step from a design standpoint, nor does it provide a reference trail traceable to design bases documents. Implementation of this program will expand the technical bases of the EOPs and reduce the potential for unidentified safety issues. This will provide CR-3 with Emergency Operating Procedures consistent with the best nuclear plant practices and improve the relationship between the plant's design bases and procedures.

METHODS

The review of setpoints and the creation of a plant specific step bases document is an extensive effort. There are approximately 500 steps and 190 unique setpoints in the existing EOPs. During the EOP Safety Assessment, setpoints and steps were prioritized in order of safety significance and existing bases. Appropriate setpoints and steps will be reviewed against a standardized criteria which would include a set of design bases considerations and will be formally validated. We will document these results in a data base that will permit

retrieval of key information such as references to calculations, drawing, etc. and will improve future configuration management.

CONTINGENCIES

An assessment committee has been established that assembles on an ad hoc basis. The individuals on this committee are familiar with the EOPs, the GEOG/TBD and the licensing and design basis of CR-3. Should significant issues surface during this focused review, this committee is available to determine the safety significance of the issue, any impact on operability, and any reportability requirements.

Concurrent with the setpoint and step bases validation effort, a comprehensive revision to each EOP will be issued to incorporate improvements and close out "open items" associated with the EOPs. It should be noted, as shown on the attached schedule, that these activities are to occur in parallel to improve timeliness of reaching the end product. It is possible that concerns could be identified in the engineering effort that could not be incorporated into this revision.

SCHEDULE

The attached schedules depict the current plan which is, in our judgement, a fairly optimistic and aggressive schedule. It may, therefore, be subject to change as progress is made. We will keep you advised of any changes necessary in future correspondence.

RESULTS

The deliverables of this effort will be:

1. A Setpoint/Plant Specific Step Bases Document.
2. A reduced "Open Items List"
3. Comprehensive EOP Revisions

VERIFICATION PLAN

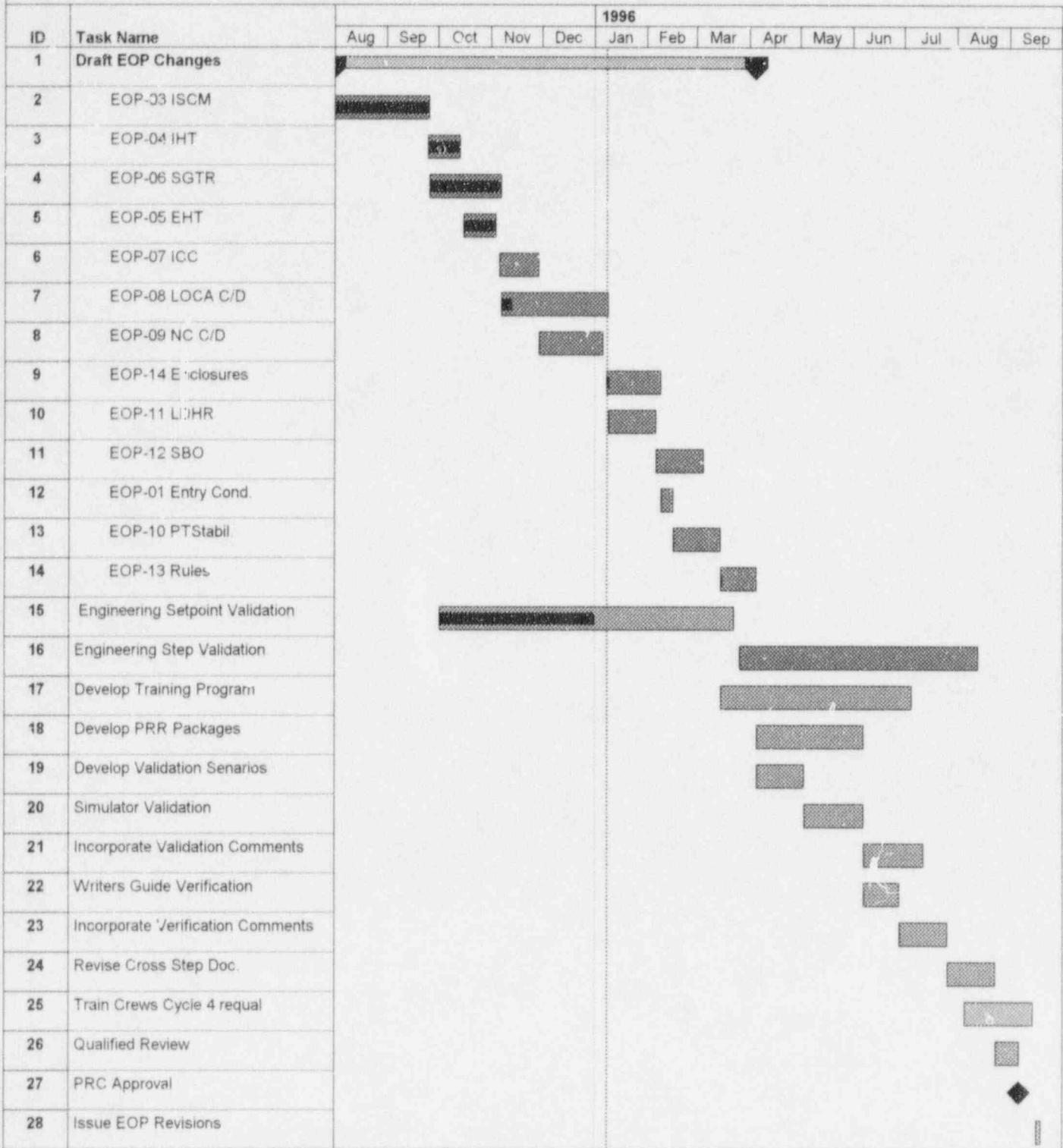
The EOP Project Manager will provide monthly progress reports to management. In addition, as with any focused review program, suspected design bases issues have the potential to surface. The standing committee outlined above will be established to evaluate suspected issues should they arise. A detailed list of open items will be maintained by the EOP Project Manager and reviewed periodically by CR-3 Management. It is anticipated that appropriate QA reviews (surveillance or audits) will be performed as well. The Plant and Nuclear General Review Committees (our on-site and off-site review committees) will maintain cognizance of this like all other key focus items.

ACCOUNTABILITY

Issue Sponsor: Bruce Hickle Director, Nuclear Plant Operations

Issue Manager: Gary Becker EOP Project Manager

EOP Enhancement Program-Phase 2



Project: EOP Comprehensive Revision Date: Mon 1/8/96	Task		Summary	
	Critical		Rolled Up Task	
	Progress		Rolled Up Milestone	
	Milestone		Rolled Up Progress	