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**Florida
Power**
CORPORATION

August 15, 1984
3F0884-13

Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 84-19

Dear Sir:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

RHT/feb

Attachment

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PDR ADOCK 05000302
Q PDR

**FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 84-19**

1. VIOLATION

10 CFR Part 50 Appendix B, Criterion II requires that activities affecting quality be accomplished under controlled conditions.

The licensee's Quality Program, paragraph 1.7.1.2, specifies compliance with 10 CFR 50, Appendix B and ANSI Standards listed in Table 1-3. Table 1-3 commits to Regulatory Guide 1.33 (1978) which endorses ANSI Standard N 18.7-1976.

ANSI Standard N 18.7-1976, paragraph 5.2.7.1 requires the scheduling and planning of maintenance so that plant safety is not compromised.

Contrary to the above, on June 18, 1984, plant maintenance was not properly scheduled or planned in that an instrument was removed from service in a manner that compromised plant safety. At approximately 0955, a maintenance activity removed the Emergency Feedwater Flow instrument, FW-312-FI, from service. The removal of this instrument requires the plant to comply with a Technical Specification Action Statement. The Action Statement was not entered because operations personnel were not cognizant that the instrument was in a degraded condition. The operations personnel had released the instrument for work on May 20, 1984, and until June 18, 1984, were not effectively apprised of the instrument's status.

This is a Severity Level IV Violation.

1. RESPONSE

(1) FLORIDA POWER CORPORATION POSITION:

Florida Power Corporation concurs with the stated violation in that a technician did remove a card from Emergency Feedwater Flow Indicator 312 (FW-312-FI) rendering it inoperable without notifying the Shift Supervisor on duty.

(2) APPARENT CAUSE:

The cause of this violation is personnel error.

(3) CORRECTIVE ACTIONS:

The Shift Supervisor on duty (SSOD) was notified and the action statement was entered.

(4) ACTION TAKEN TO PREVENT RECURRENCE:

Personnel involved were instructed on proper notification of the SSOD prior to commencement of maintenance to the plant.

A policy has been implemented to have a representative from each shop attend each shift turnover meeting to discuss the work activities to be carried over to the next shift and also new work to be started. Any technical specifications or safety-related items related to the work carried over to the next shift will be strongly emphasized.

(5) DATE OF FULL COMPLIANCE:

Florida Power Corporation is in full compliance as of August 7, 1984.

2. VIOLATION

Technical Specification 6.8.1.a requires procedures listed in Regulatory Guide 1.33, 1972.

Regulatory Guide 1.33, paragraph H-2 requires a procedure for each calibration activity listed in the Technical Specifications.

Technical Specification surveillance requirement 4.3.3.6, Table 4.3-7, item 18 requires a channel calibration of the Emergency Feedwater Ultrasonic Flow Indicators at least once per 18 months.

Contrary to the above, as of June 20, 1984, a procedure for the calibration of the Emergency Feedwater Ultrasonic Flow Indicators had not been written and the indicators had not been calibrated. These instruments were required to be calibrated since the issuance of Technical Specification Amendment Number 38 dated April 17, 1981.

This is a Severity Level IV violation.

2. RESPONSE

(1) FLORIDA POWER CORPORATION POSITION:

Florida Power Corporation concurs with the stated violation in that a calibration procedure had not been written for the subject instruments. However, it should be noted that the instruments were being calibrated in accordance with the vendors technical manual. Florida Power Corporation does take exception to the last sentence in the violation in that the subject technical specification amendment was Number 67, dated January 17, 1984, not Number 38.

(2) APPARENT CAUSE OF VIOLATION:

The cause of this violation is inadequate procedures.

(3) CORRECTIVE ACTIONS:

The vendors technical manual was reviewed and approved by the Plant Review Committee (PRC) on June 26, 1984 and the subject instruments were calibrated on June 27, 1984.

(4) ACTION TAKEN TO PREVENT RECURRENCE:

Calibration instructions for FW-312-FI and FW-313-FI will be written and added to the Preventative Maintenance Program. These instructions will be implemented by September 7, 1984.

(5) DATE OF FULL COMPLIANCE:

Florida Power Corporation will be in full compliance by September 7, 1984.