

Florida Power

CORPORATION
Crystal River Unit 2
Docket No. 50-302

September 26, 1995
3F0995-14

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

Subject: NRC Inspection Report No. 50-302/95-14
NRC to FPC letter, 3N0995-02, dated September 1, 1995

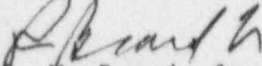
Reference: Licensee Event Report (LER) 95-013-00
FPC to NRC letter, 3F0895-07, dated August 7, 1995

Dear Sir:

By your letter of September 1, 1995, Florida Power Corporation (FPC) received a Notification of Violation concerning a postulated fire that could result in Makeup Tank vortexing and a 10 CFR 50, Appendix R concern. The purpose of this letter, with its attachment, is to provide our response.

It should be noted that this postulated event was identified by FPC and reported to the NRC by LER 95-013-00. This response contains updated corrective action status information. Specifically, the "Additional Corrective Action" scheduled in LER 95-013-00 has been completed.

Sincerely,


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

PMB/RLM:ff

Attachment

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

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FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/95-14
REPLY TO A NOTICE OF VIOLATION

VIOLATION 50-302/95-14-02

10 CFR 50, Appendix R, Paragraph III.G, Fire Protection of Safe Shutdown Capability, requires, in part, that one train of systems necessary to achieve and maintain hot shutdown conditions from either the control room or the emergency control station(s) is free of fire damage.

Contrary to the above, on July 7, 1995, it was determined that a postulated fire on the 95 foot elevation in the auxiliary building could result in continuous hydrogen (H₂) addition to the makeup tank, leading to vortexing in the makeup tank which could cause damage to the running makeup pump (High Pressure Injection Pump). The postulated fire could also result in the loss of function to the idle makeup pumps. The existing plant configuration could allow a single event to render the entire makeup and purification system inoperable.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The cause of this event was a design analysis error in that the original Analysis/Calculation for hydrogen pressure in the Makeup Tank (MUT-1) did not take into consideration vortexing at reduced inventory in the tank.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. A formal operability evaluation was conducted in accordance with NOD-14, titled "Evaluating Operability and Determining Safety Function Status". This activity was completed on July 7, 1995 and found the makeup system to be operable based on the ability to isolate the H₂ to MUT-1 with Makeup Valve (MUV) MUV-493, the H₂ regulator manual isolation valve.
2. MUV-492, the hydrogen regulator manual bypass valve, and MUV-493, the hydrogen regulator manual isolation valve, have been placed under the administrative control of the Shift Supervisor On Duty (SSOD). The valves will be opened by a "dedicated operator" only during hydrogen addition.
3. A Short Term Instruction (STI) and an Operations Study Book (OSB) entry have been issued to operations personnel to specify requirements to administratively control MUV-492 and MUV-493.
4. FPC Nuclear Engineering Design management personnel reviewed this issue with Mechanical and Instruments & Controls engineers to heighten awareness of this event. This activity was completed on September 15, 1995.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

FPC Nuclear Engineering Design personnel will coordinate with operations personnel to determine the longer term resolution to the issue of MUT-1 vortexing under Appendix R scenarios. Additional corrective actions may be developed as a result of this determination.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The requirement for any additional longer term actions will be determined by January 31, 1996.