



**Florida  
Power**  
CORPORATION

Crystal River Unit 3  
Docket No. 50-302

June 19, 1992  
3F0692-16

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

Reference: NRC letter to FPC dated May 22, 1992  
Notice of Violation - Inspection Report 92-10

Dear Sir:

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

Sincerely,

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

EEF:mag

Enclosure

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

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FLORIDA POWER CORPORATION  
NRC INSPECTION REPORT NO. 50-302/92-10  
REPLY TO NOTICE OF VIOLATION

VIOLATION 50-302/92-10-01

Technical Specification 6.5.1.6 states that the Plant Review Committee shall be responsible for review of all procedures and changes thereto as required by Specification 6.8.2 and that the PRC shall be responsible for the review of all proposed tests and experiments that affect nuclear safety. Specification 6.8.2, excepting specific program implementing procedures, requires the review cycle for procedures and changes thereto to consist of an intradepartmental review by a Qualified Reviewer, and an interdisciplinary review by Qualified Reviewer(s) in interfacing departments, as specified in administrative procedures, and approval by the responsible Superintendent or Manager, as specified in administrative procedures. The PRC shall then review the 10 CFR 50.59 evaluation within 14 days of approval.

Contrary to the above, on March 18, the "B" Decay Heat Closed Cycle Cooling Water Heat Exchanger was chemically cleaned utilizing work instructions detailed in Work Request 0284949. These work instructions constituted a change to Preventive Maintenance Procedure PM-112; DC, SW, and SC Heat Exchanger Maintenance Inspection/Cleaning/Shooting and Plugging. The work instructions had not been reviewed and approved in accordance with the Qualified Reviewer review cycle.

Contrary to the above, on April 1, a test was performed to recreate the conditions that existed during troubleshooting the "C" inverter which led to an inadvertent opening of the feeder breakers to the offsite power transformer and a plant trip. The offsite power transformer was the dedicated offsite power supply to both safety related 4160 Volt engineered safeguards busses. The test was performed in accordance with Work Request 0295619. Work instructions for the performance of the test were not reviewed by the PRC prior to the implementation of the test.

Admission or Denial of the Alleged Violation

Florida Power Corporation (FPC) accepts the violation.

Reasons for the Violation

The violation is attributed to a weakness in the procedures that implement the guidelines for determining the review requirements for work instructions. Nuclear Operations Department procedure NOD-12 prescribes the management philosophy required to implement Technical Specification (TS) 6.8.1 and 6.8.2. Existing administrative procedures that implement the TS and this policy limited the review of activities by AI-400 to those that may cause a plant transient or may create a personnel or equipment safety concern.

### Corrective Steps That Have Been Taken and the Results Achieved

A Task Force was established to review the current program controls. The Task Force concluded that NOD-12 provided adequate guidance for the implementation of the Technical Specification. It was also concluded that the implementing procedures required further detail to provide more definitive criteria for determining the appropriate review and approval process for work instructions.

A meeting was held with the maintenance planners to review the event. More definitive criteria such as the impact on safety, complexity of the task, frequency of implementation, and impact on plant operations were established to assist in the decision process in the development, review and approval of work instructions.

### Corrective Steps That Will Be Taken to Avoid Further Violations

A revision will be made to the Plant Operating Quality Assurance Manual (POQAM) procedure (AI-400) to provide more definitive criteria to implement the department policy for CR-3 organizations. A revision will be made to maintenance program work process procedure (CP-113) to assure that the threshold for work instruction review and approval is adequately defined and incorporated into process control procedures and guidelines.

### Date Full Compliance Will Be Achieved

The changes to the implementing procedures will be completed and the cited work instructions will be reviewed by the Plant Review Committee (PRC) prior to July 30, 1992.