

Florida

Crystal River Unit 3 Docket W., 50-302

July 17, 1992

3F0792-09

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

Reference: 1) NRC letter to FPC dated June 18, 1992 Notice of Violation - NRC Inspection Report 92-12

Dear Sir:

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

Sincerely,

raigh . M. Brard, 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. 50-302/92-12 REPLY TO NOTICE OF VIOLATION

# VIOLATION 50-302/92-12-01

10 CFR 50, Appendix B, Criterion XVI, Corrective Action states, in part, that measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, the corrective action taken as a result of an auxiliary building door, posted as a high radiation barrier, being found fully open by the NRC inspector on April 14, 1992, was inadequate to prevent repetition. On May 5, 1992, the same posted high radiation door was found open by the licensee. The corrective action for the first event was administrative and involved counseling and training. The recurrence of the event indicated that the corrective action was not effective.

## Admission or Denial of the Alleged Violation

Florida Power Corporation (FPC) accepts the violation.

## Reasons for the Violation

The violation is attributed to a lack of specific actions taken to strengthen the physical controls that were in place at the time of the first incident. The original occurrence was considered to be an isolated personnel error and not a generic issue.

# Corrective Steps That Have Been Taken and the Results Achieved

On May 18, 1992, an interim change was made to General Employee Training (GET) strengthening individual awareness of responsibilities concerning high radiation barriers. This revision to GET was made permanent on July 7, 1992.

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

The Radiation Protection department will evaluate future control of high radiation areas to improve posting and locking relevance to actual radiological conditions. Closure mechanisms will be installed on the doors in question. Additional closure mechanisms will be considered for other high radiation barriers pending an evaluation of the effectiveness of the installed devices.

# Date Full Compliance Will Be Achieved

The corrective actions will be completed by December 31, 1992.