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**Florida
Power**
CORPORATION

January 31, 1985
3F0185-24

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. 84-30

Dear Mr. O'Reilly:

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

AEF/feb

Attachment

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 84-30

VIOLATION 84-30-03

Technical Specification 4.11.2.1.2 requires in Table 4.11-2 that a release from the Auxiliary Building and Fuel Handling Area Exhaust Monitor (RMA-A2) be analyzed for dose rate between 2 to 6 hours after a change in power level that exceeds 15% of rated thermal power in one hour.

Contrary to the above:

On November 2, 1984, a power level change in excess of 15% rated thermal power occurred in one hour at 11:00 p.m. and the RMA-A2 sample was not taken and analyzed until 5:41 p.m. on November 3, 1984.

This violation is similar to a violation described in Licensee Event Report 84-17. This previous violation was not cited in a Notice of Violation in accordance with 10 CFR 2 Appendix C Criteria.

This is a Severity Level IV violation (Supplement I).

RESPONSE

(1) FLORIDA POWER CORPORATION POSITION:

Florida Power Corporation concurs with the stated violation in that on November 2, 1984 a power level change in excess of 15% rated thermal power occurred in one hour at 11:00 p.m. and the RM-A2 sample was not taken and analyzed until 5:41 p.m. on November 3, 1984, as reported in LER 84-020-00.

(2) APPARENT CAUSE OF VIOLATION:

The failure to sample RM-A2 within the prescribed time frame is recognized as a personnel error. Operations personnel informed the Chemistry Department of the power change but contrary to Special Conditions Surveillance Plan, SP-442, failed to inform them of the specific surveillances required. Due to this error only the gross equivalent iodine sample of the reactor coolant system was performed.

(3) CORRECTIVE ACTIONS:

All Operations personnel were instructed in the proper use of SP-442, which is used to identify surveillances which are required under non-routine operating conditions. The vehicle for this instruction was a "Short Term Instruction." The "Short Term Instruction" requires that Operations personnel, who notify other groups that a special surveillance is due, provide all pertinent information concerning the requirement, including the surveillance procedure number to be performed.

In addition, the two chemistry technicians involved in this incident were individually counseled as to consequence of missing the surveillance requirement as well as their responsibility in performing special surveillances. Training of all chemistry technicians was conducted in order to increase the awareness of the subject surveillance requirement.

(4) ACTION TAKEN TO PREVENT RECURRENCE:

The corrective steps outlined above are sufficient to avoid further violations.

(5) DATE OF FULL COMPLIANCE:

Florida Power Corporation is presently in full compliance with these requirements.