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**Florida  
Power**  
CORPORATION

July 18, 1984  
3F0784-14

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. 84-12

Dear Sir:

Florida Power Corporation provides the attached as our response to the subject inspection report. Based on the fact this violation did not involve a degradation of fire protection capabilities, we consider it to have minor safety or environmental significance, and we request that it be reclassified from Severity Level IV to Severity Level V.

Should there be any questions, please contact this office.

Sincerely,

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

AEF/feb

Attachment

8410240088 841002  
PDR ADOCK 05000302  
Q PDR

**FLORIDA POWER CORPORATION'S  
RESPONSE**

**INSPECTION REPORT 84-12**

**VIOLATION**

The following violation was identified during an inspection conducted on March 28-April 27, 1984. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

T.S. 6.8.1.a requires that written procedures be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, November 1972. Compliance Procedure CP-113, Handling and Controlling Work Requests and Work Packages, requires that when equipment alteration is completed that the equipment be restored to design (as found) status and independently verified.

10 CFR 50 Appendix B, Criterion V as implemented in Crystal River 3 FSAR Section 1.7.1.5 requires that instructions, procedures or drawings include appropriate quantitative or qualitative acceptance criteria for determining that important quality activities have been satisfactorily accomplished and that written procedures be adhered to in matters relating to nuclear safety.

Contrary to the above, on April 25, 1984, the NRC inspector identified two examples where safety-related systems were not restored to design (as found) status following equipment alteration.

- a. A fire barrier separating two safety related electrical trains, cable tray numbers 183 (green) and 171 (red), located in the southeast section of the cable spreading room was removed; and
- b. Electrical cables were not properly secured in a vertical section of cable tray number 522 (red) where the cable tray makes the transition to a horizontal run in the auxiliary building.

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

**RESPONSE**

(1) **FLORIDA POWER CORPORATION'S POSITION**

Florida Power Corporation concurs with the stated violation of failing to restore equipment to design status after maintenance was performed.

However, we take exception to the inferred importance of cable tray covers for fire protection. The primary functions of a cable tray cover are to provide protection from traffic and to prevent accumulation of debris in the tray. The covers themselves are not rated or tested to demonstrate any protection from fire. Based on this, we consider this violation to be of minor safety or environmental significance, and we request that it be reclassified to Severity Level V.

(2) **DESIGNATION OF APPARENT CAUSE**

The cause of this violation has been determined to be personnel error.

(3) CORRECTIVE ACTION

The cable tray covers were located and installed. A work request was written to secure the cables in cable tray #522. The cables were secured in accordance with approved procedures and work was completed on May 9, 1984.

(4) CORRECTIVE ACTION TO PREVENT RECURRENCE

Responsible personnel have been counseled on the importance of adhering to procedures and policies.

(5) DATE OF FULL COMPLIANCE

Florida Power Corporation is in full compliance as of July 5, 1984.