



**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

October 1, 1992

3F1092-02

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

Reference: 1) NRC letter to FPC dated September 2, 1992
Notice of Violation and Notice of Deviation
Inspection Report 92-15

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. 50-302/92-15
REPLY TO A NOTICE OF VIOLATION

VIOLATION 50-302/92-15-01

49 CFR 172.604 states that a person who offers a hazardous material for transport must provide a 24-hour emergency response telephone number for use in the event of an emergency involving the material, and that the telephone number must be monitored at all times.

Contrary to the above, during the week of June 1-5, 1992, a shipment was made with an incorrect emergency response telephone number listed on the shipping papers.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The cause of the violation is considered to be personnel error. Although the continuously monitored plant telephone number and title of the contact person were correct, the extension number listed was incorrect due to a recent change in our internal telephone system. FPC recognizes this could have caused an unacceptable delay in providing emergency response information.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The erroneous telephone extension number has been removed from the emergency response notification. Additionally, a red border is now stamped around the notification to make it more visible.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To heighten Nuclear Operations personnel awareness of this incident and to emphasize the importance of maintaining correct information, an internal mailing has been made describing this situation to all FPC Nuclear Operations managers and supervisors. Within this letter, these individuals are requested to verify all documented telephone numbers and extensions and to take corrective action if necessary. Also included in the letter are additional details from NRC Information Notice 92-62, "Emergency Response Information Requirements For Radioactive Material Shipments", to underscore the significance of this matter.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The corrective actions were completed on September 24, 1992.

FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/92-15
REPLY TO A NOTICE OF DEVIATION

DEVIATION 50-302/92-15-02

The licensee committed, in correspondence to the Office of Nuclear Reactor Regulation, dated August 17, 1981, to be able to provide continuous sampling for radioactive iodine and particulate concentrations likely to be present under post-accident conditions.

Contrary to the above, it was determined that during an inspection conducted on July 22 to August 16, 1991, that the mid and high range post-accident flow monitors for the Reactor Building and the Auxiliary Building vents were not calibrated, or calibration-checked, on any given frequency, in order to verify the validity of the flow measurements. Accurate flow measurements are necessary to determine the radioactive iodine and particulate concentrations from the vent samples under post-accident conditions.

ADMISSION OR DENIAL OF THE ALLEGED DEVIATION

Florida Power Corporation (FPC) accepts the Deviation.

REASON FOR THE DEVIATION

The reason for the deviation is considered to be personnel error. By misinterpreting the manufacturer's maintenance recommendations, it was erroneously believed that calibration of these flow strings was required only if the flow meter was changed, the operation of the system was modified, or in case of a malfunction.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

New flow elements have been installed in the mid and high range post-accident flow monitors for the Reactor Building and the Auxiliary Building vents and verified to respond correctly.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FUTURE DEVIATIONS

The applicable Surveillance Procedure has been revised to enhance the flow check provisions and will provide proper assurance that the flow measurements are accurate.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The corrective actions were completed on September 23, 1992.