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**Florida
Power**
CORPORATION

July 26, 1984
3F0784-20

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. 84-16

Dear Mr. O'Reilly:

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

Should there be any questions, please contact this office.

Sincerely,

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

RHT/feb

Attachment

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**FLORIDA POWER CORPORATION
RESPONSE**

INSPECTION REPORT 84-16

VIOLATION

Technical Specification 6.8.1 requires adherence to procedures listed in Regulatory Guide 1.33, 1972, that cover the review and approval of procedures; and requires adherence to procedures that cover surveillance activities of safety related equipment.

Procedure AI-400, Plant Operating Quality Assurance Manual, requires completion of a Procedure Review and Transmittal Sheet (PR & TS) by a responsible supervisor for a surveillance procedure containing completed data sheets to insure that the procedure data is complete and/or the acceptance criteria has been met.

Surveillance Procedures, SP-333, Control Rod Exercises, and SP-321, Power Distribution Breaker Alignment and Power Availability Verification, cover surveillance activities on safety related equipment.

Contrary to the above:

1. Procedure SP-333, performed on May 8, 1984, was not adhered to in that Data Sheet II (Enclosure 2) was not completed.
2. Procedure SP-321, performed on May 22, 1984, was not adhered to in that Data Sheet III (Enclosure 3, Page 12) was missing from the procedure and therefore was not completed.
3. Procedure AI-400 was not adhered to in that the missing data for procedures SP-333 and SP-321 was not noted on the PR & TS.

This is a Severity Level IV Violation (Supplement 1).

RESPONSE

(1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporation (FPC) concurs with the above stated violation. While the above violation is considered to be within an anticipated rate of error in view of the number of procedures completed and reviewed, FPC does not consider such errors acceptable. FPC will continuously strive for procedural adherence.

(2) DESIGNATION OF APPARENT CAUSE:

The cause of these events was personnel error.

Enclosure 2 of Surveillance Procedure SP-333 was completed the day prior to transmittal of the procedure. Apparently, Enclosure 2 was misplaced and not attached behind Enclosure 1 (consisting of eight pages) prior to transmittal under the Procedure Approval and Transmittal Sheet (PA & TS). This omission was not identified during the Supervisor's review and, therefore, not noted on the PA & TS.

Enclosure 3, page 12, of Surveillance Procedure SP-321, was apparently not included in the working copy of the SP-321 when issued on May 22, and not identified prior to transmittal during supervisory review on that date. Supervisory review did, however, identify this the following day when another working copy was issued with the same page missing.

(3) CORRECTIVE ACTION

It was determined that another Surveillance Procedure, SP-110, documented the local breaker position checks that were not documented by omission of Enclosure 2 to SP-333. Enclosure 2 of SP-333 was also performed to document the local breaker position. A short-term instruction was issued to remind reviewers to assure that all applicable portions of all procedures performed are properly filled out and transmitted with the completed procedure. Upon discovery that Page 12 of SP-321 was not completed, it was immediately performed and completed satisfactorily.

(4) CORRECTION ACTION TO PREVENT RECURRENCE

Reviewers have been instructed on the importance of reviewing completed data of Surveillance Procedures not just for content, but to make sure all required data sheets are attached to the PA & TS prior to transmittal.

(5) DATE OF FULL COMPLIANCE

Florida Power Corporation has completed the corrective actions mentioned above and is now in full compliance. In addition, a second level review is continuing to be completed for all Surveillance Procedures.