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**Florida
Power**
CORPORATION

September 28, 1984
3F0984-09

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. 84-21

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report. With reference to Examples 2 and 3 of the stated violation, Florida Power would like to make it clear that, in our opinion, the issue of these items is not procedural adherence. In both instances, the procedural guidance was inadequate to assure that operators would perform the required operations properly given the special circumstances that existed at the time. Consequently, as detailed in the report, corrective actions have been aimed towards strengthening the procedures involved.

Sincerely,

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

AEF/feb

Attachment

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**FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 84-21**

VIOLATION 84-21-04

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

Maintenance procedure MP-123 directs the disassembly and reassembly of the nuclear services closed cycle cooling pumps. Surveillance procedures SP-104 and SP-113 provides the determination of the nuclear enthalpy rise hot channel factor (F_{NH}) and the calibration of the power range nuclear instrumentation respectively.

Contrary to the above:

1. On June 28, 1984, procedure MP-123 was not adhered to, in that, the bearing temperature and vibration readings required in step 9.3 and recorded on data sheet enclosure (3) were not taken at the required 15 minute intervals. In addition, the temperature readings were not taken in the three planes (i.e., horizontal, vertical, axial) required by the data sheet.
2. On June 16 and July 11, 1984, procedure SP-104, 6.2.2, was not adhered to, in that an incorrect multiplier was used to determine the nuclear enthalpy rise hot channel factor.
3. During the period of June 11-18, 1984, while the plant was operating at 100% \pm 1% full power, procedure SP-113 was not adhered to, in that, the flow optimization verification of steps 1.4 and 6.6 (which could not be performed during the April 13, 1984, quarterly calibration and is required to be performed immediately after achieving 100% full power) was not performed.

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

RESPONSE

(1) FLORIDA POWER CORPORATION'S POSITION:

1. Florida Power Corporation agrees with the stated violation as it relates to MP-123.
2. Florida Power Corporation agrees with the stated violation as it pertains to SP-104, Hot Channel Factor Calibrations, in that an incorrect multiplier was used.
3. Florida Power Corporation agrees with the stated violation in that the required calibration was not performed after achieving 100% full power.

(2) APPARENT CAUSE OF VIOLATION:

1. The apparent cause of this violation was procedure inadequacy, in that the specified time frame was not long enough to allow the required readings to be taken and the positions where temperatures were to be taken were not clear.

2. The cause of this violation was procedure inadequacy in that the data sheet did not reflect what was in the body of the procedure. The value used in the calculation of the enthalpy rise hot channel factor was 1.119. This is approximately 5.2% higher than the 1.064 value which should have been used. This caused the overall calculation for $F_{\Delta}^N H$ to be approximately 5.2% conservative.
3. The cause of this violation was administrative oversight, in that no administrative controls were in place to identify the requirement upon achieving 100% full power.

(3) **CORRECTIVE ACTIONS:**

1. The maintenance procedure will be revised to allow sufficient time for the required readings and to ensure temperature readings on the applicable planes (horizontal, vertical, axial) are recorded.
2. The surveillance procedure was revised to assure that the data sheet agrees with the body of the procedure.
3. The applicable scheduling procedure is being revised to indicate that when full power is achieved, the calculation will be performed.

(4) **ACTION TAKEN TO PREVENT RECURRENCE:**

- 1., 2., 3. The corrective actions described above are sufficient to prevent recurrence.

(5) **DATE OF FULL COMPLIANCE:**

1. This revision to MP-123 will be implemented by November 30, 1984.
2. This revision to SP-104 was implemented on August 2, 1984.
3. This revision will be implemented by November 30, 1984.