

April 17, 1996

Florida Power Corporation
Crystal River Energy Complex
Mr. P. M. Beard, Jr. (SA2A)
Sr. VP, Nuclear Operations
ATTN: Mgr., Nuclear Licensing
15760 West Power Line Street
Crystal River, FL 34428-6708

SUBJECT: MEETING SUMMARY - PRESENTATION ON CORRECTIVE ACTION PLAN CRYSTAL RIVER 3 - DOCKET NO. 50-302

Dear Mr. Beard:

This refers to the meeting requested by the NRC on April 16, 1996, in Atlanta, Georgia. The purpose of the meeting was to discuss the status of your progress on your Corrective Action Program.

There were five areas of concern expressed by the NRC: management oversight and involvement has been insufficient; inadequate configuration management - many design basis issues; lack of sensitivity to the need to comply with regulations; a marginally effective engineering organization; and poor operator performance. It is our opinion, that this meeting was beneficial.

Enclosed is a List of Attendees and the FPC Presentation Handout. The agenda included the following specific topics: Management Corrective Actions Program; Design Basis Issues/Recourse Management; Plans for Upgrading Operating Crew Performance; EOP Upgrade Progress; 50.59 Reviews; TSC Ventilation; OTSG NDE Issues; and FSAR Review.

In accordance with Section 2.790 of the NRC's "Rules of Practice, "Part 2, Title 10 Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us

Sincerely,

Orig signed by Ellis W. Merschoff

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Ellis W. Merschoff, Director,
Division of Reactor Projects

Docket No. 50-302
License No. DPR-72

Enclosures: 1. List of Attendees
2. FPC Presentation Handout

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cc w/encls:

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B. J. Hickle, Director
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L. C. Kelley, Director (SA2A)
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L. Raghavan, NRR
 G. Hallstrom, RII
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NRC Resident Inspector
 U.S. Nuclear Regulatory Commission
 6745 N. Tallahassee Road
 Crystal River, FL 34428

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LIST OF ATTENDEES

Florida Power Corporation

- P. Beard, Senior Vice President Nuclear Operations
- G. Boldt, Vice President Nuclear Production
- R. Davis, Assistant Director Operations and Chemistry
- B. Gutherman, Manager, Nuclear Licensing
- L. Kelley, Director Nuclear Site Support
- P. Tanguay, Director Nuclear Engineering and Projects

Nuclear Regulatory Commission

- K. Barr, Division Reactor Safety (DRS), Plant Support Branch Chief, RII
- R. Butcher, Senior Resident Inspector
- C. Casto, DRS, Engineering Branch, RII
- S. Ebnetter, Regional Administrator
- A. Gibson, Director, DRS, RII
- G. Hopper, DRS, Operator Licensing
- J. Kreh, DRS, Plant Systems Branch
- K. Landis, Chief, Division of Reactor Projects, Branch 3
- L. Mellen, Division of Reactor Projects, Project Engineer
- E. Merschoff, Director, Division of Reactor Projects
- L. Raghavan, Project Manager, NRR
- B. Schin, Reactor Inspector, DRS, Maintenance Branch

REQUEST FOR DUPLICATION

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TO: OFFICE SERVICES SECTION

DATE:

4/18/96

FROM:

Wilma

Name

DRP

Division

16060

Extension

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SUBJECT:

FPC Mtg Summary

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Wilma

COMPLETED BY:

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DATE RETURNED:

4/18/96

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**ALL PRIORITY REQUESTS SHOULD BE GIVEN TO THE
CHIEF, OFFICE SERVICES SECTION**

Status of Corrective Action Plan

- 46 of original 49 items are complete
- Those remaining open are:
 - » Procedure change process BPI (will use short version)
 - » I&C surveillance procedure revalidation
 - » QC holdpoints to witness points

Status of Corrective Action Plan

- 5 of 6 additional corrective actions complete (P. Beard letter of September 18, 1995)
- The open item is:
 - » QPD surveillance of log practices

Performance Indicators

- Long Range Plan and 1996 Plan revised to focus in four key areas
 - » Human Performance
 - » Regulatory Performance
 - » Plant Production and Reliability
 - » Financial Performance
- 1996 first quarter performance indicator report trends the above areas

BOLDT RESPONSE TO THE MRP REPORT

AS OF APRIL 15, 1996

CURRENT STATUS:

Complete with Documentation (or N/A).....	46	Last report 41	MUT Additional Corrective Actions:	Complete.....	5
Complete, need Documentation.....	0				
Not Complete.....	3			Not Complete..	1
	49				6

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>I. Initiate an aggressive effort to improve, from the top down, internal communication of the safety culture, including legal compliance aspects, of nuclear power operations.</p>			
<p>1 The Mission Statement was revised to place primary emphasis on nuclear safety.</p> <p><u>NRC COMMENTS (From Inspection Report 96-C1)</u></p> <p>The inspector reviewed the licensee's Nuclear Operations Long Range Plan for Excellence, dated January 1995, and verified that the Mission Statement was revised from 1994 to place nuclear safety before electrical generation. The Long Range Plan established a direction for nuclear operations efforts over the next five years. The inspector also reviewed the Nuclear Operations Long Range Plan for Excellence, dated January 1996, and noted that the key nuclear operations challenge in the Long Range Plan was human performance and safety focus.</p>	<p>Pat Beard/ Gary Boldt</p>		<p align="center">COMPLETE Documents on File</p>

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<p>2 The Long Range Plan identifies safety culture as the top priority and has established actions to go with it. This was also stressed in the 1995 plan.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector noted that human performance and safety culture improvement was the top nuclear operations challenge in the 1995 Long Range Plan for Excellence. The inspector also reviewed the Nuclear Operations 1995 Annual Plan, dated January 1995. The Annual Plan consisted of the nuclear operations goals and supporting action plans for each department which, in turn, support meeting the key nuclear operations challenges in the Long Range Plan for Excellence. The inspector noted that the 1995 Annual Plan also placed high priority on human performance and safety culture improvement.</p>	<p>Pat Beard/ Gary Boldt</p>		<p>COMPLETE Documents on File</p>
<p>3 Safety and conservative decision-making was emphasized by senior management at the "all hands" meetings in January. This will be continued in subsequent quarterly meetings.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>Residents attended the subject meetings. The importance of safe operation was emphasized to licensee personnel.</p>	<p>Pat Beard/ Gary Boldt</p>		<p>COMPLETE. PROCESS IN PLACE. ALL-HANDS MEETINGS ARE CONDUCTED QUARTERLY. THESE TOPICS WERE DISCUSSED IN THE 1/95 AND 4/95 MEETINGS.</p>

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<p>4 A change was made to the plan of the day to remove the number of continuous days on line.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed various copies of the Plan of the Day for 1995 and 1996 and noted that the number of continuous days on line statement was removed. This statement was removed on January 25, 1995.</p>	Brent Moore		COMPLETE Documents on File
<p>5 The Plant Manager wrote a bulletin describing the nuclear safety and event free operations program which was distributed to all Nuclear Operations personnel.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents attended the DNPO's briefing of personnel. This program will be implemented by each manager reporting to the DNPO. This program is a living program and will be enhanced as operating experience is gained. The residents have reviewed the draft Plant Operations specific program.</p> <p>The residents monitored operator simulator exercises and noted the event free operations program elements were incorporated during the monitoring and critiquing of operator performance.</p>	Bruce Hickie		COMPLETE Documents on File

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>6 Specific presentations were made to "all hands" on the event free operations program. This program will be implemented by the departments reporting to the Plant Manager by April 1, 1995. Each supporting department will fully implement this program by July 1, 1995.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>Residents attended the subject meetings. The importance of safe operation was emphasized to licensee personnel and the new initiative the event free operations program was presented.</p>	<p>ALL DIRECTORS + Jerry Campbell, Brent Moore</p>		<p>COMPLETE Documents on File</p>
<p>7 Line management directed that future audits include an assessment of safety culture in the departments audited. Performance criteria for this portion of the assessment will be based on FPC management expectations developed, in part, from consideration of IAEA bulletin 75-INSAG-4.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents have discussed the safety culture audit program with responsible supervisors. The review criteria, for the audits, was reviewed by the inspectors.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>Assessment: The licensee's self assessment programs are a strong initiative to identify areas that need improvement. The one remaining challenge is the implementation of corrective actions for the issues identified by the assessments.</p>	<p>Paul McKee</p>		<p>COMPLETE. PROCESS IN PLACE.</p> <p>Audit 95-02-MAKP made some observations. Audits 95-03-SSUP and 95-04-CREW provided more intense analyses of hp/sc parameters.</p>

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<p>8 A letter documenting FPC senior management commitment to (and role in achieving) conservative decision-making was sent from FPC (Allen Keesler) to INPO (Zack Pate).</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed the subject letter which was dated February 1, 1995. The letter was in response to a request from the president of INPO. The letter positively ensured that the need for conservative decision making was thoroughly ingrained in Crystal River's nuclear organization. The letter also included a brief outline of actions by FPC which ensure conservative decision making.</p>	Gary Boldt		<p>COMPLETE Document on File</p>
<p>9 An event response checklist for the Nuclear Shift Manager to use in responding to and investigating significant plant events has been implemented. This approach is one of several initiatives intended to emphasize the lead role of line (especially plant) management in nuclear safety and legal compliance.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents have reviewed the event response checklist and found it to have the potential to be a useful tool. The residents verified the NSMs were aware of the checklist and were prepared to use it when needed.</p>	Bruce Hickle		<p>COMPLETE Document on File</p> <p>Other initiatives include line management becoming more involved in personal safety by attending plant safety meetings and PRC establishing guidelines and goals to strengthen its role as a safety review committee.</p>

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>II. Expand existing management procedural initiatives, including additional emphasis on procedure adherence. This should include efforts to improve ownership and the quality of procedure maintenance by users, making them more simple and usable. This should be done consistent with the communication of safety culture.</p>			
<p>10 Implementation of the event free operations program in all departments by July 1, 1995.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>The inspectors reviewed the overall Event-Free Operations Program, which had been approved by the Senior Vice President, Nuclear Operations. The stated program objective was to ensure that all personnel are properly equipped with and utilize the "tools" necessary to perform their job function with the result being an ever-decreasing frequency and significance of errors to the point that operations is event free. The program applied to all personnel; including operations, engineering, maintenance, contractors, etc.; who work within Nuclear Operations.</p> <p>Assessment: Overall , the inspectors concluded that Event-Free Operations Program implementation was excellent in the operations department and acceptable in all departments. Remaining licensee challenges were to more consistently apply Event Free Operations in all departments and to monitor and trend in more detail.</p>	<p>DUPLICATE ITEM TO # 6 WHICH APPLIES TO THIS AREA ALSO</p>		<p>COMPLETE. SEE ITEM # 6.</p>

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<p>11 A formal business process improvement (BPI) evaluation will be performed on the procedure change process in 1995.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed documentation and held discussions with licensee personnel who indicated that the formal BPI was scheduled to begin in June 1996, which is after the CR3 refueling outage.</p>	<p>Bruce Hickle Dan Kurtz</p>	<p>6/96 START 12/96 COMPLETE</p>	<p>PENDING</p> <p>The process will be reviewed internally by Nuclear Operations personnel following the outage. The primary focus will be on the Temporary Change process. Ref: BJH to PMB PM96-009 4/1/96.</p>
<p>12 "All hands" meetings presented and discussed event free operations and procedure compliance policies.</p>	<p>Pat Beard/ Gary Boldt</p>		<p>COMPLETE. PROCESS IN PLACE. SEE ITEM # 3</p>

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<p>13 Procedure ownership is being transferred to end users on a trial basis (beginning in the I&C shop). The purpose of this effort is to enhance ownership and accountability among procedure users and to assure the level of procedure detail (or simplification) is commensurate with user needs. Such efforts, however, must maintain a proper balance of quality of technical input. Therefore, system engineering will remain a close partner in review and approval.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed inter-office correspondence which documented the transfer of procedures to the various maintenance groups (electrical, I&C, mechanical) and to operations and NPTS. The inspectors also reviewed documentation from the maintenance shops which indicated that the transfer of procedure ownership was going well and maintenance was continuing to work with engineering to ensure the technical requirements of the procedures were met. The inspector also discussed this item with NPTS and operations personnel who provided comments similar to the maintenance feedback. Licensee management indicated that the trial period was successful and the transfer of procedure ownership was permanent.</p>	<p>Bruce Hickle/ Ron Davis/ Jerry Campbell</p>		<p>COMPLETE</p> <p>The Managers of the Maintenance shops have been made the Interpretation Contact for procedures their shops perform.</p>

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<p>14 A computer program (NUPOST) for recording and tracking procedure change recommendations was implemented. Operations led the development and implementation of this product.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspectors verified that NUPOST was implemented. The inspector also selected several procedures at random and observed a demonstration on how NUPOST works. During the demonstration, the inspector noted that operations personnel were using NUPOST. However, review of procedures owned by NPTS and maintenance did not provide evidence which indicated that these departments were using NUPOST as frequently as operations.</p>	Greg Halnon		<p>COMPLETE</p> <p>System is operational. Contact is Earnie Gallion.</p>
<p>15 A training initiative to intentionally fault (or fail) a procedure during simulator exercises to verify that operators will use the procedure change process is being implemented.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed and verified that the lesson plans were prepared for the training activity. The inspector also held discussions with operations and training personnel regarding the manager of nuclear plant operations policy concerning the use of 50.59 and 50.54 to determine appropriate corrective actions for the scenarios.</p>	Rolf Widell		<p>COMPLETE</p> <p>Scenarios in each of the first two cycles of simulator requalification contained situations where procedures did not contain adequate guidance for correction of specific equipment problems. For each, MNPO policy regarding the use of 50.59 and 50.54 to determine appropriate corrective actions was developed and discussed. These types of activities will periodically occur during future requal. sessions.</p>

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<p>16 When appropriate, new procedures and key changes to existing procedures are tested on the simulator.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed documentation dated June 5, 1995, which indicated that simulator validation had been performed for procedures EOP-7, EOP-8, SP-110, SP-113, SP-130, and the new AP on Rapid Shutdown.</p>	<p>Rolf Widell/ Jerry Campbell</p>		<p>COMPLETE. PROCESS IN PLACE.</p> <p>Examples include ITS required changes to SP-417 and loss of vital busses from 100% power. Also, simulator validation has been performed on EOP-7 and 8, SP-110, 113 and 130, and the new AP on Rapid Plant Shutdown.</p>
<p>17 All I&C surveillance procedures are being re-validated by the I&C shop.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents have discussed the review and re-validation of I&C surveillance procedures with I&C personnel. This effort could result in improved procedures with fewer events.</p>	<p>Bruce Hickle/ Jerry Campbell</p>	<p>7/31/96 (All)</p>	<p>IN PROGRESS</p> <p>An SP team has been established that will validate and re-write both SPs and PTs. Some SPs have been validated on the simulator.</p> <p>As of 2/29/96, all of the outage I&C SPs have been validated. All remaining I&C SPs will be completed by 7/31/96.</p>
<p>18 To simplify procedures and place more accountability on the performer and performing departments, some "hold points" have been replaced with "witness points" (second party verification), and some new witness points have been added.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>This item was in progress and was about 50 percent complete. The inspector reviewed selected procedures which had been revised to replace hold points with witness points. The procedures were being revised during their regular revision cycles.</p>	<p>Bruce Hickle Jerry Campbell</p>	<p>ONGOING 12/31/96</p>	<p>IN PROGRESS</p> <p>The task force has identified those discretionary hold points that will become second-party verifications, witness points, or just go away. Procedure revisions were dependent on approval of NOD-48, which was signed the week of 6/19/95. The final step in the process will be to revise existing procedures and make the changes to the affected hold points. Approximately 160 procedures are affected. The procedures are being revised during their regular revision cycle. About 50% are complete.</p>

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<p>19 To further clarify procedure intent and improve procedure usability, "independent verification" and "concurrent verification" have been re-defined (in CP115).</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents reviewed the change in definition in CP 115. The operations personnel were concerned at first that the revised definition would inhibit their ability to perform tagging under unique circumstances (such as in high radiation areas) where exposures to other hazards would dictate concurrent tagging. The provisions in CP 115 alleviated this concern.</p>	Bruce Hickle		COMPLETE CP-115 on File

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<p>20 To improve line ownership of the problem report and precursor processes, program and procedure responsibility was moved from the QA director to the plant manager.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>As noted above, the plant manager has assumed the responsibility for the precursor and problem report processes and has placed emphasis on the program. The number of reports submitted is part of a licensee trending program. The number of precursor cards submitted has increased dramatically since the first of the year and the results are very positive.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>Assessment: The management attention and oversight to the issue of operability determinations has been inadequate and is considered a weakness. It has been six months since the subject of inadequate operability determinations was discussed with licensee management and an improved procedure was still not available. It should be pointed out that the licensee's briefings of the NRC on operability issues have been good and conservative. However, written operability determinations are very brief with few details and generally considered inadequate. The clear expectations reflecting management's highest safety standard was absent as shown by the lack of a detailed and thorough process with rigorous guidance for making operability determinations.</p>	Bruce Hickle		<p>COMPLETE CP-111 on File</p> <p>Additionally, CP-144 (Root Cause Analysis) has been revised.</p>

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ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>20 (continued)</p> <p><u>NRC COMMENTS (From Inspection Report 95-18)</u></p> <p>The inspectors reviewed Quality Programs Surveillance Report #QPS-95-0092, on the Event Free Operations Program for the site. The surveillance noted one good work practice, the use by operations of the tool bag tags to effectively focus on the use of human performance tools.</p> <p>The surveillance report identified several areas where improvement could be realized.</p>			
<p>III. Increase the management attention devoted to managing change. This includes configuration management, procedures and processes, and organizational change. Ineffective, or incomplete, management of changes was a significant contributor to many of the events or conditions reviewed by the MRP.</p>			
<p>21 The project manager/team approach to plant modifications was significantly strengthened, including operations representation.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>Multidiscipline project teams have been established with representatives from the various plant departments for all major projects and modifications. A project manager from NEP is assigned as the single point of accountability. Representatives present their department's position instead of personal opinion and provide input on the project in an effort to ensure that the needs of the plant are addressed.</p>	Paul Tanguay		<p>COMPLETE Revisions to NEP-102 and NEP-212 on File</p>

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<p>22 Formal action plans (using a specific format) were implemented for significant issues.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspectors verified that action plans were developed and being implemented for significant issues such as the TSC ventilation system; setpoints; make-up tank and BWST/RB sump level issues; surveillance requirement extension to 24 months; control room habitability envelope; and thermo-lag. The inspector reviewed copies of the action plans. The inspector noted that some of the issues also had issue managers assigned to ensure that adequate attention and focus were being provided to resolve the associated issue.</p>	ALL DIRECTORS		COMPLETE Examples on File
<p>23 A computerized Ful/Text search capability was implemented to help manage change in procedures.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed the list of documents that were available on FULTEXT and observed a demonstration of how procedures can be retrieved and viewed on FULTEXT. The inspector verified that the latest revision of the procedure was referenced in FULTEXT.</p>	Bill Conklin		COMPLETE System Description on File

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<p>24 The System Engineering Manual was updated to include instructions for use of CMIS and Ful/Text and other available tools to verify documents requiring change.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed revision 9 of the Nuclear Plant Technical Support Manual, dated December 1995, and verified that the manual included instructions for using CMIS and FULTEXT and other available tools to verify documents requiring change.</p>	<p>Jerry Campbell</p>		<p>COMPLETE Document on File</p>
<p>25 A check-list was added to the MAR closure process to assure all documents requiring change are completed.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>(FPC has) Revised design control procedures to strengthen the process for ensuring that required documents are revised prior to modification package closure and system turnover. The project manager monitors and tracks the revision of other plant documents which require a change.</p>	<p>Paul Tanguay</p>		<p>COMPLETE See # 21 above</p>

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<p>26 Maintenance of system histories in the Tech Support area will assist with continuity through organizational change. Some examples are the quarterly report, action plans, system libraries, and system outage critiques.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed quarterly reports for the third and fourth quarters of 1995, selected action plans and system libraries. The information was thorough and detailed and provided the licensee with information on system performance.</p>	<p>Jerry Campbell</p>		<p>COMPLETE Examples on File</p>
<p>27 A check-list for discussion items to be included in screening and selection of new supervisor candidates was implemented. This provides for senior managers to emphasize change management, safety culture, and conservative decision-making with new supervisory candidates prior to organizational change.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed the check list included in the procedure for the screening and selection of supervisory candidates. The procedure addressed the need for conservative decision making concerning plant safety.</p>	<p>Bill Conklin/ Rolf Widell</p>		<p>COMPLETE TDP-205 checklist modified. Supervisor Assessment Center evaluates change management capabilities. NucOps "red book" contains instructions regarding use of the Assessment Center and Director involvement in discussing expectations during selection process.</p>

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<p>28 The 1995 goals include reviewing the AI's and NOD's and other administrative procedures to make sure they are current. A portion of that review was completed in 1994.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed documentation which indicated that all AI's and NOD's were reviewed by December 31, 1995. Most of the procedures were revised. However, not all the revisions had been completed. The remaining revisions were scheduled to be completed by February 29, 1996.</p>	Bruce Hickle		<p>COMPLETE</p> <p>AIs and NODs were reviewed by 12/31/95. All except AI-200 "NUCLEAR PLANT STAFF ORGANIZATION AND RESPONSIBILITY" have been revised. AI-200 will be revised by 5/01/96.</p>
<p>29 Computer software controls are being audited with the purpose of improving change management.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The computer software was reviewed by the licensee in Audit 95-01-SQA, 1995 Audit Report of Software Quality Assurance. Procedure NOD-37, Software Quality Assurance, was revised to comply with the recommendations of the SQA audit.</p>	Bill Conklin		<p>COMPLETE</p> <p>Audit # 95-01-SQA completed this action. NOD-37 was revised to comply with the recommendations.</p>

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<p>30 Nuclear Operations is taking over the in-processing and fitness for duty programs from Human Resources and has established a project team with a designated transition manager.</p> <p><u>NRC COMMENTS (From Inspection Report 96-01)</u></p> <p>The inspector reviewed the documentation which discussed the transfer of the in-processing and fitness for duty programs from Human Resources to Nuclear Operations. As of April 3, 1995, Nuclear Operations had been performing all tasks needed for unescorted access to CR3.</p>	Larry Kelley		<p>COMPLETE</p> <p>As of April 3, 1995, Nuclear Operations Access Control has been performing all tasks needed for unescorted access to CR3.</p>
<p>31 The Master Schedule, the fuel cycle action plan, the 90-day, weekly and daily schedules, have been implemented as instruments to regulate and control the rate of change.</p>	Phil Skramstad/ Brent Moore		<p>COMPLETE</p> <p>Examples on File</p>
<p>32 A new section has been added to the quarterly performance indicators to look at changes occurring in fifteen different areas to arrive at an overall assessment of safety impact.</p>	Paul McKee		<p>COMPLETE</p> <p>Documents on File</p>
<p>33 Changes recently made to the FPC QA Plan will allow the Nuclear General Review Committee (NGRC) and the Plant Review Committee (PRC) to focus on more safety significant (as opposed to routine) issues.</p>	Paul McKee		<p>COMPLETE</p> <p>Documents on File</p>

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>34 NGRC-led targeted assessments (similar to the Management Review Panel Report) will be regularly performed.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>The inspectors attended significant portions of the NGRC operations and maintenance subcommittee meeting and observed a thorough, detailed technical review of several issues; including the service water inspections, the makeup tank issues, and evaluations of cause and corrective actions for problem reports and precursor cards. The subcommittee concluded that in some cases, the licensee needed to be more candid with respect to personnel errors, and stop building programmatic fixes for every error.</p> <p>The inspectors noted that the licensee has established a Senior Management Self-Assessment meeting on a biannual basis. This is considered an excellent initiative with the potential to greatly enhance the licensee's self assessment process.</p> <p>The inspectors have witnessed several strong initiatives to perform self assessments of management and plant performance. These new programs and enhancements to existing programs are still relatively new, and while they have identified some substantive issues, corrective actions have not been completely implemented. The inspectors will continue to monitor the programs to determine their effectiveness.</p>	Paul McKee		COMPLETE Document on File (E. Mroczka report)
<p>35 Management directed that a quality audit be performed on the engineering process for making and changing engineering calculations and that the audit team include NGRC and/or other independent engineering calculation expertise.</p>	Paul McKee		COMPLETE The Engineering Audit in November, 1995 included these elements.

22

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
36 Future significant change projects will require prior completion of an action plan, schedule, <u>and</u> contingency plan for potentially negative outcomes.	ALL DIRECTORS		COMPLETE. PROCESS IN PLACE. Recent examples: CCHE Action Plan; CR-3 Sepoint Action Plan.
IV. Enhance the current initiatives to improve the working relationship with the NRC, by development of a more comprehensive plan. This plan would address philosophy and expectations as well as mechanics. It should stress recognition of the value added by the regulator in each interaction. Once developed, thorough internal and external communication will be required for it to be effective.			
37 A revised plan regarding communication with the NRC was issued on January 6, 1995. It recognized the NRC's mission and value added by the regulatory process; however, further strengthening of this aspect is planned when the plan is converted to a nuclear operations directive (NOD).	Larry Kelley		COMPLETE NOD-53 has been implemented.
38 Senior management participation has increased in face-to-face phone conversations with Region II and NRR counterparts to share information and clarify expectations.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE. Recent examples: TSI, SWOPSI, RPS setpoints. See also example in # 44 below.
39 Each executive direct report is increasing the frequency of contact with their NRC counterpart.	ALL DIRECTORS & Jerry Campbell		COMPLETE. PROCESS IN PLACE. Meetings have been held both at the NRC and on site. See also example in # 44 below.

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
40 The Senior Vice President has emphasized improvement in the timeliness, directness, and completeness of NRC communications with licensing management.	Pat Beard		COMPLETE Discussions with the Sr. VP were held at the Licensing staff meeting of May 4, 1995.
41 The Senior Vice President has emphasized the need for line management involvement in the NRC communication plan.	Pat Beard		COMPLETE
42 FPC will establish routine meetings between licensing and Region II staff similar to those we continue to hold with headquarters staff.	Larry Kelley		COMPLETE
43 FPC will strengthen the participation of line management in safety, operability, and regulatory compliance discussions/meetings with the NRC. We must continue to emphasize, however, that licensing remains the single point of contact to arrange and facilitate FPC/NRC communications.	ALL DIRECTORS		COMPLETE. PROCESS IN PLACE. recent example: Bruce Hickle/Bill Stephenson contacted the NRC on May 16 re: NOD-14.
44 FPC will increase contact between mid- and upper-level management and their NRC counterparts.	ALL MANAGERS		COMPLETE. PROCESS IN PLACE. recent example: R. Widell, J. Lind and G. Halnon met with R II staff to discuss Licensed Operator Training on May 24, 1995. Minutes on file. OTHER EXAMPLES?
45 Clear objectives for safety/regulatory performance are being developed, as well as methods to monitor performance against these objectives.	Larry Kelley		COMPLETE (see PMB's 3/1/95 presentation to the NRC)

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>V. The MRP also recommends improving the timeliness of design engineering response to plant needs.</p>			
<p>46 Internal communications were enhanced to press issues to the forefront earlier. An example is the establishment of an operator workaround list in response to the Salem event.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents have reviewed the licensee's operator work-around list. The list is a comprehensive list of outstanding work-around items and includes a status column so management can keep abreast of outstanding issues. For historical purposes, the operator workarounds that have been closed are attached to the back of the list under closed items.</p> <p>The licensee is placing increased emphasis on the PR/PC program. A significant rise in the number of PCs written has been noted by the inspectors. Several significant trends and issues have been identified by the licensee using this process.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>NED implemented monthly design engineering priority meeting with representatives from various departments. The meetings were held to discuss emergent plant issues, prioritize REAs, and discuss NED workload versus plant needs.</p>	<p>ALL DIRECTORS</p>		<p>COMPLETE</p> <p>(the Nuc Ops newsletter, the Operations Journal, the Focus Item list and naming issue managers for specific projects, e.g. Sid Powell for CCHE are examples)</p>

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>47 Engineering established an initiative to assure their customers have direct input to project priority setting.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <p>Multidiscipline project teams have been established with representatives from the various plant departments for all major projects and modifications. A project manager from NEP is assigned as the single point of accountability. Representatives present their department's position instead of personal opinion and provide input on the project in an effort to ensure that the needs of the plant are addressed.</p>	Paul Tanguay		<p>COMPLETE</p> <p>NED Prioritization Program was established to better support day-to-day plant problems.</p>
<p>48 Design engineering is in the process of relocating to, and consolidating all engineering employees and appropriate technical records at, the Crystal River Site.</p> <p><u>NRC COMMENTS (From Inspection Report 95-08)</u></p> <p>The residents have discussed the relocation efforts and its impact on engineering at this time. The relocation is scheduled to be completed by August 1995 and should result in improved internal communications within FPC.</p> <p><u>NRC COMMENTS (From Inspection Report 95-16)</u></p> <ul style="list-style-type: none"> - NEP was relocated from the corporate office to the site. - Combined all engineering resources (NEP and NPTS) into one organization. 	Paul Tanguay		COMPLETE

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
49 Managers in both design and system engineering functions have begun to increase the frequency of communication with the NRC. It has been particularly emphasized that they do so at the start of new projects and initiatives in order to communicate action plans, schedules, and contingency plans (for potentially negative results) prior to implementation.	Paul Tanguay/ Jerry Campbell		COMPLETE. PROCESS IN PLACE. Recent example: J. Masada and K. Lancaster met with the NRC engineering counterpart Chuck Casto.

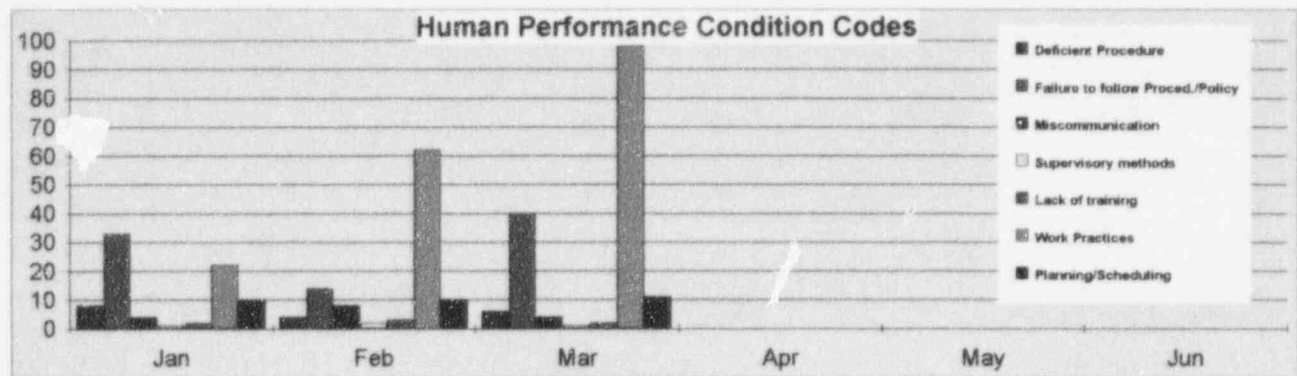
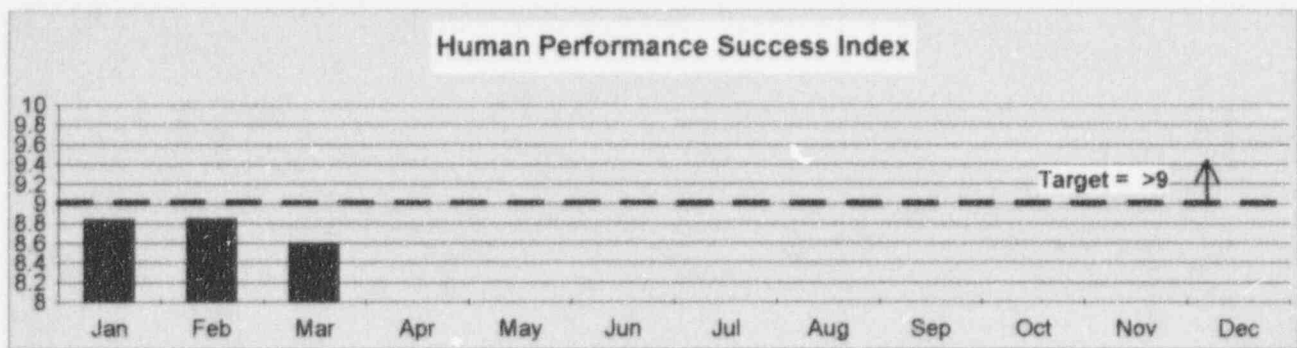
ADDITIONAL MUT CORRECTIVE ACTIONS

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
1 Revise page 16 of AI-400B (Enclosure 3) so that step 1 is more broadly focused.	Bruce Hickle		COMPLETE Completed by revision 17 to AI-400C (see page 12).
2 Revise page 17 of AI-400B (Enclosure 3) so that the checklist for infrequently performed tests or evolutions is approved by the DNPO or his designee (usually the shift manager).	Bruce Hickle		COMPLETE Completed by revision 17 to AI-400C (see Enclosure 7).
3 Revise AI-500, page 46, step 4.3.2.3.2 to assure the intent of the procedure or evolution is also considered by the shift supervisor and that he follows the following four steps when in doubt: <ul style="list-style-type: none"> - Communicate - Approve - Plan - Schedule 	Bruce Hickle		COMPLETE Completed by issuance of OI-09.

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
<p>4 The management review panel process (MRP) is a good concept but fell short in application when used to initially review the MUT event. Expand the MRP process to apply to all potential NRC violations whether self-identified or NRC-identified. Draft a charter or guideline for conducting MRP's to assure consistency and thoroughness of reviews. Some of the items that should be included are:</p> <ul style="list-style-type: none"> - an attempt to interview all personnel involved, including support groups where appropriate; - assurance that CP-111 and CP-144 have been fully applied as appropriate; - review of all appropriate logs, chart recordings, completed procedures, REDAS data, annunciator printouts, and other relevant documentation; - review for generic aspects of the event, i.e., similar violations, events, errors, systems, etc.; - assure both technical and human performance aspects of the issue get equal attention. 	Bruce Hickle		<p>COMPLETE</p> <p>Completed by issuance of MRP guideline dated August 29, 1995.</p>
<p>5 There is some evidence that operations log entries remain imprecise or incomplete. Schedule further audits and/or training on the topic of adequate log keeping. Consider reinforcing log keeping practices by running table top or simulator exercises specifically for this purpose.</p>	Bruce Hickle	9/5/96	<p>QPD conducted Surveillance Procedure QPS-96-0017 "Nuclear Plant Operations Logkeeping" on 2/8/96. As a result, information from OI-05 and ROT lesson plans will be used to convey log keeping expectations and evaluate the standard by adding a signature for log keeping techniques in the SPO and PPO TPMs by 9/5/96.</p>

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
6 Develop specific examples of evolutions that require higher authority to authorize. Then, conduct training with Shift Supervisors and Assistant Shift Supervisors on these examples and the guidance in applicable AIs.	Bruce Hickie		COMPLETE Completed by Operations Workshop on Procedural Use Expectations training conducted during Cycle 1 Requal; 1996.

29



Definition of the Performance Indicator

The top indicator is a measure of the number of human performance events (Problem Reports and Precursor Cards with cause/condition codes that fall into the human performance category), divided by the number of opportunities for events to occur (number of hours worked), and normalized to fit a 1 - 10 scale on the chart. Problem Report severity level is based on the Severity Level Classification for Operations Significant incidents listed in CP-111, Initiation and Processing of Precursor Cards and Problem Reports, Enclosure 3.

The lower chart shows seven "condition codes" used under the Human Performance category.

Performance Measurement / Goal

The target is to achieve and maintain the success index > 9.

Analysis / Summary

1st Quarter 1996 - There were 359 occurrences designated as "Human Performance" of which 50 were Problem Reports. The Problem Reports listed below are the reason for the index being < 9 this quarter. The formula used to calculate the index contains a penalty factor for Problem Reports with a severity level greater than zero. There were five with a Severity Level 1, and two with a Severity Level 2 in the first quarter

Severity Level 2:

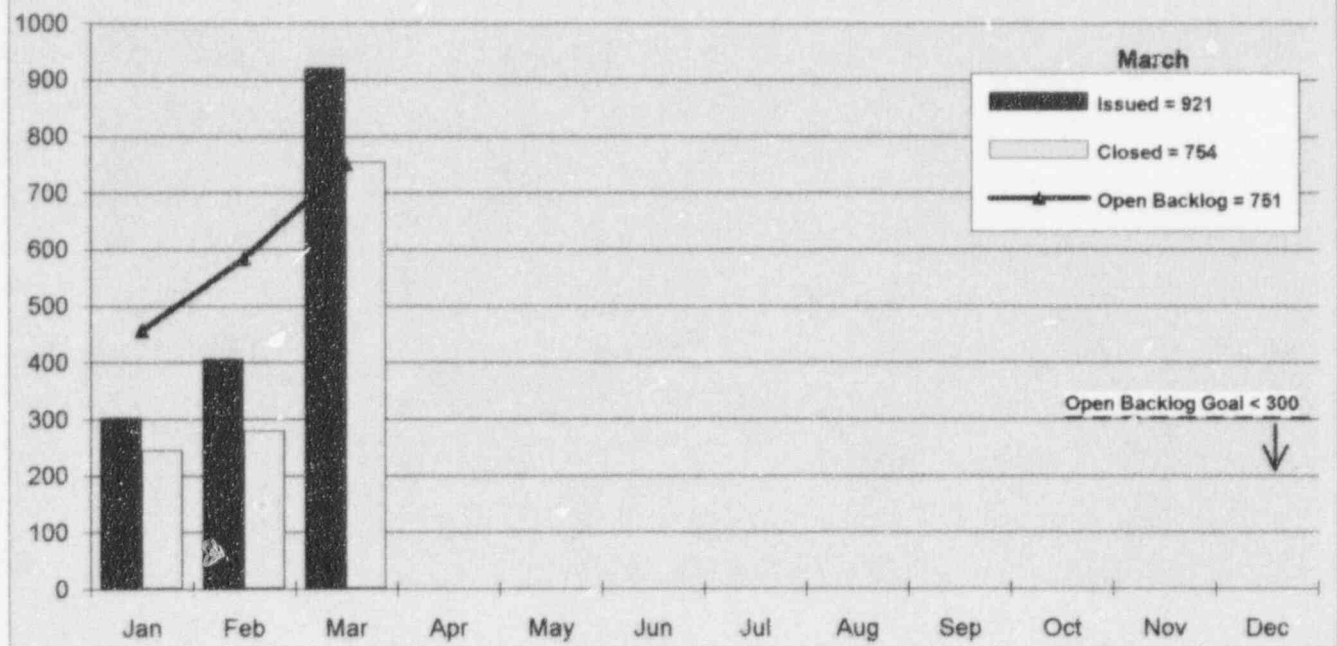
- PR-96-0008, RCS cooldown: rate exceeded. This PR was reportable.
- PR-96-0103, MSV-171 Instrument Tubing. This PR was reportable.

Severity Level 1:

- PR-96-0004, Decay Heat system loss of inventory.
- PR-96-0047, Worker entered RCA without proper RWP sign-in.
- PR-96-0058, Procedural inadequacy leaves pressure gauge isolated.
- PR-96-0069, Radioactive Material identified outside the RCA.
- PR-96-0072, RC subcooling monitors inappropriately categorized per Reg. Guide 197.

The analysis of the human performance codes shows an increase in those due to "work practices" and "failure to follow procedures or policies". **40% (65) of the "Work Practice precursor cards for the quarter were related to vital area doors unsecured. This accounted for 41 of the 90 listed for March.** The average number of precursor cards and problem reports issued has significantly increased since the start of Refuel 10.

Precursor History



Definition of the Performance Indicator

This indicator tracks the number of Precursor Cards issued each month, the number of cards closed each month, and the number of open "backlog" cards.

Performance Measurement / Goal

An open backlog target of < 300 has been established for 1996. The target was chosen based on average number of precursor cards issued per month.

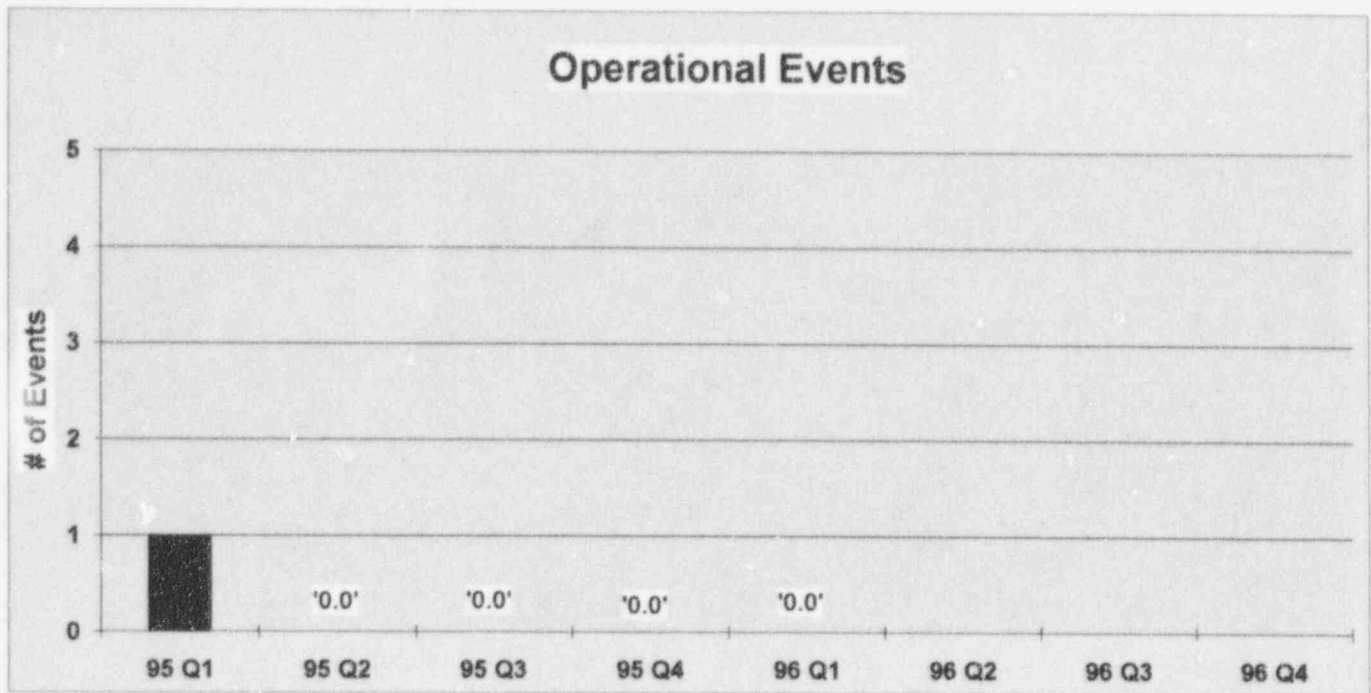
Analysis / Summary

There were 673 cards written in 1994, 2,930 cards in 1995, and 1629 in just the first quarter of 1996. This is attributed to Refuel 10.

The backlog has taken a dramatic increase during Refuel 10 and the number of closures also hit a record high. A major emphasis must be placed on closures for the remainder of 1996 to drive this trend down.

OPEN BACKLOG THAT IS GREATER THAN 30 DAYS OLD:

January — 208 of 457 = 46%
 February — 256 of 584 = 44%
 March — 314 of 751 = 42%



Definition of the Performance Indicator

This Indicator tracks the number of "events" caused by personnel error that impact plant operation. This Indicator tracks "operational events" with the expectation that human errors can be controlled such that they will not result in an undesirable event (one which affects plant operation).

Examples of "events" considered are:

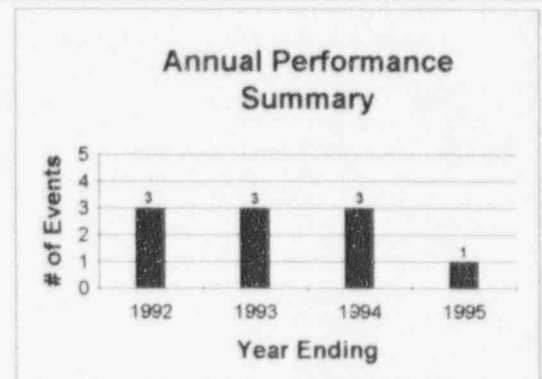
- Unexpected System Actuation
- Tech. Spec. Violations
- Unplanned Releases and Spills
- Excessive Radiation Dose
- Destruction of Equipment
- Mismanagement of Reactivity Control
- Serious Injury
- Operation Outside of Operating Limits
- Plant Trips
- Degradation of Plant Safety Margins

Performance Measurement / Goal

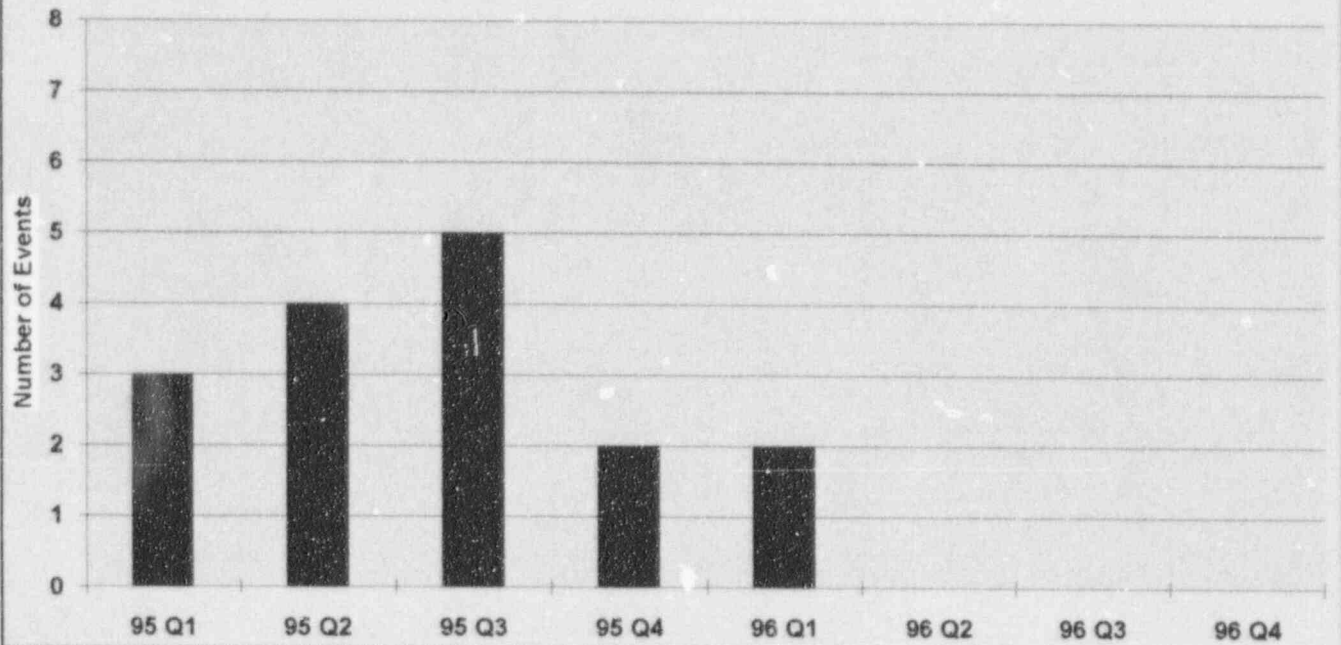
The goal is zero events.

Analysis / Summary

The first quarter of 1996 resulted in 111 Problem Reports, the majority occurring in March during 10R. It was determined through review of these that there were none which fell into the criteria established for this indicator.



Components Not In Expected Position



Definition of the Performance Indicator

This indicator is derived by reviewing all Problem Reports and Precursor Cards for those addressing components found in an unexpected position.

Performance Measurement / Target

The target is to have zero events, but there is no specific goal set, as this is a type of "precursor" trend to avoid an event that would affect plant operation. For example, an increasing slope would be an indication that the probability of a more significant problem has increased.

Analysis / Summary

There were two instances of a components found in an unexpected position during the first quarter (one in February and one in March). They are addressed by:

- **PR-96-0058**, Procedural Inadequacy leaves pressure gauge isolated. An operator discovered DH-4-PI1 and DH-4-PI2 isolated by DHV-123 and DHV-125. The gauges should have been in service when RCS pressure is below 60 psig. OP-404 and OP-301 did not address these valves.

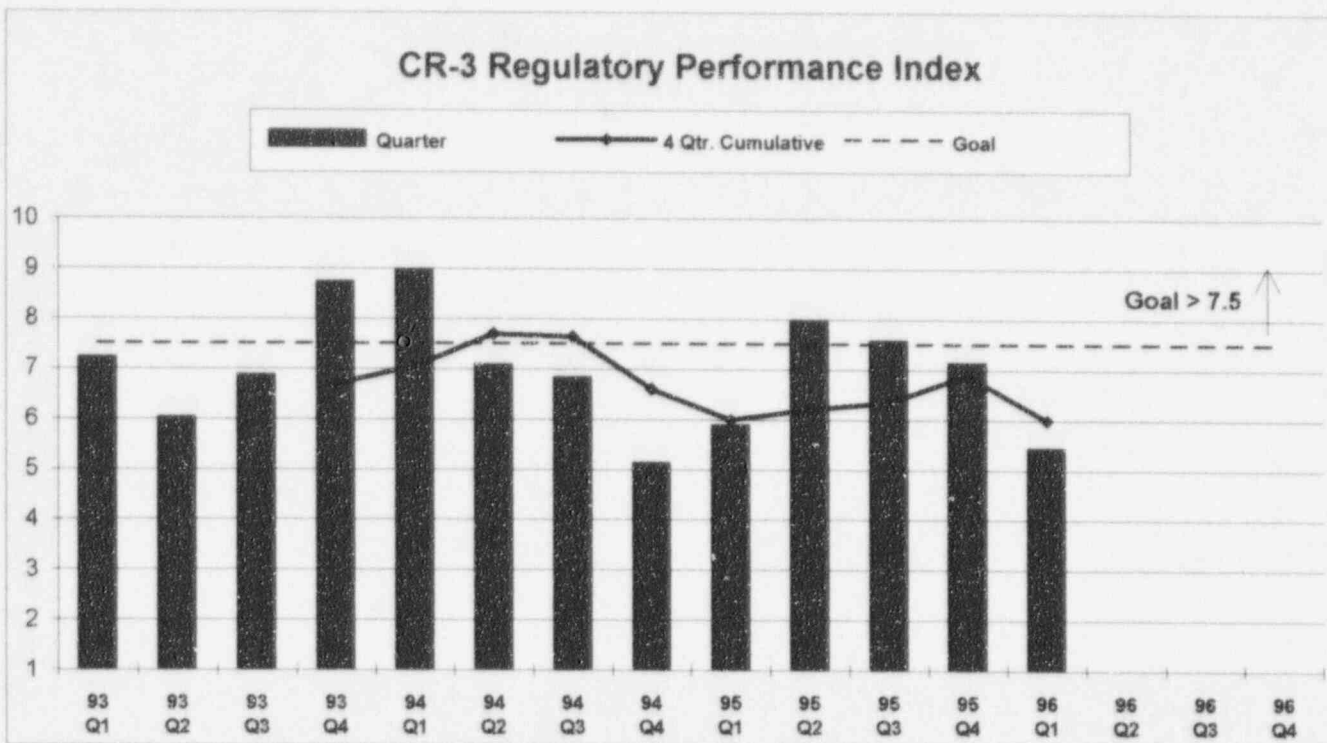
- **PC-96-1449** - MUV-105, 106, & 155 were left closed after work instruction, WI-301< was completed instead of returning them to their normal open position. Corrective actions are addressed in the response to the Precursor Card.

Two more apparent instances have been identified in early April on PC-96-1861 and PC-96-1862. They will not appear on the first quarter total, but are indicative of the need to emphasize S.T.A.R. when working with valve lineups.

Responsible: R. W. Davis, Assistant Plant Director Operations & Chemistry

Page: 4

Data Collected By: R. L. Thompson, Senior Nuclear Quality Assurance Engineer



Definition of the Performance Indicator

This is an index developed by Nuclear Operations Site Support to trend CR-3's overall performance from a regulatory viewpoint. It is a weighted summation of indicator values derived from common performance indicators. These are: Automatic Scrams; Safety System Actuations; Significant Events; Safety System Failures; Forced Outage Rate; Equipment Forced Outages per 1000 hours Critical; Radiation Exposure (cumulative is for 8 quarters); NRC Violations; Strengths and Weaknesses; Number of LERs; and NOTES Items Completed. The results are normalized to fit a scale of 1 - 10.

Performance Measurement / Goal

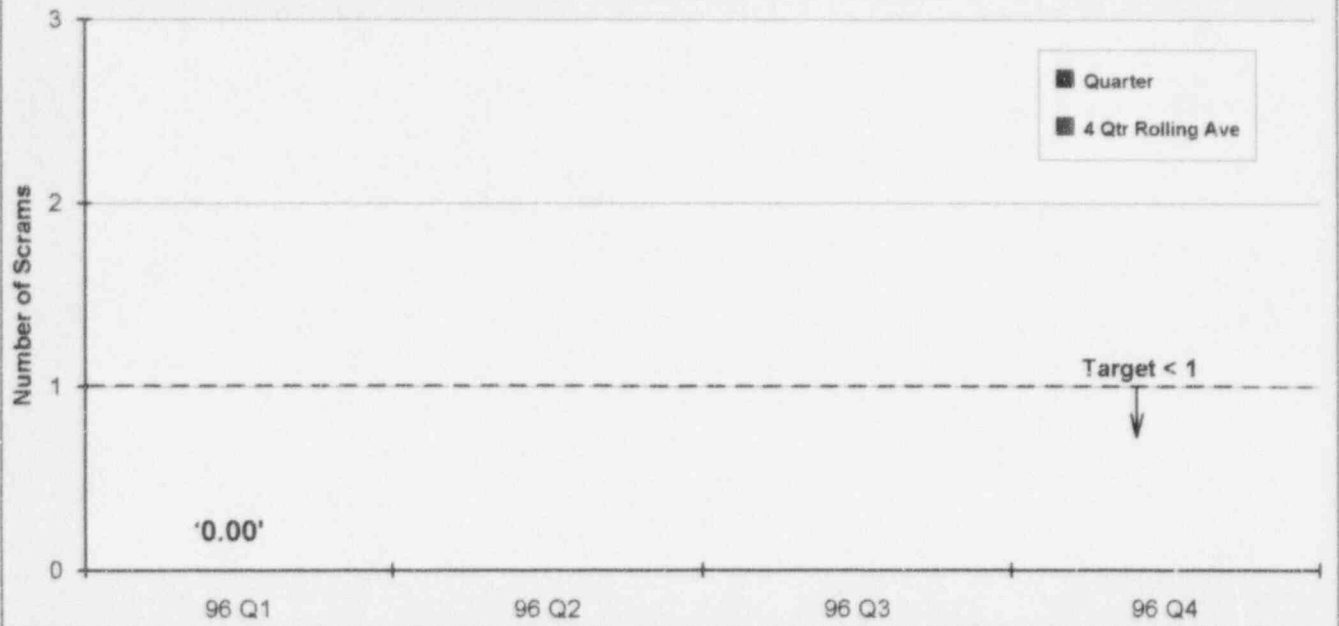
The goal is to achieve and maintain an index of greater than 7.5.

Analysis / Summary

The Regulatory Performance Index (RPI) for the 1Q 1996 dropped as compared to the 4Q 1995 due to: (1) the condenser tube outage in January which increased the Forced Outage Rate and the Equipment Forced Outages per 1000 hours critical; (2) the refueling 10 outage starting early which increased the Radiation Dose and the Equipment Forced Outages per 1000 hours critical; and (3) the NRC inspection report had a higher ratio of cited violations and a higher ratio of weaknesses. These decreases were partially offset by: (1) fewer Significant Events; and (2) a higher ratio of NOTES Items Completed. **These decreases can be turned around by operating CR-3 with no forced outages for the remainder of 1996; by keeping the radiation doses ALARA; by finding and reporting NRC violations ourselves; and by increasing our strengths.**

The RPI for the Cumulative 4 Quarters ending the 1Q 1996 dropped as compared to the Cumulative 4 Quarters ending the 4Q 1995. The Quarterly RPI for the 1Q 1996 was less than the Quarterly RPI for the 1Q 1995. The performance indicators that contributed to the decrease were: Forced Outage Rate; Equipment Forced Outages per 1000 hours Critical; and Radiation Exposure. These decreases were partially offset by increases in the following performance indicator values: Safety System Actuations; and the ratio of NRC Violations. **These decreases can be turned around by operating CR-3 with no forced outages for the remainder of 1996; and by keeping the radiation doses ALARA.**

Unplanned Automatic Scrams per 7000 Hrs. Critical



Definition of the Performance Indicator

The number of unplanned automatic scrams (reactor protection system logic actuations) that occur per 7000 hours of operation (which is approximately one year) while the reactor is critical. Unplanned means that the scram was not part of a planned test or evolution. Unplanned automatic scrams include, for example, automatic scrams resulting from a transient, an equipment failure, a spurious signal, or human error.

Performance Measurement / Target

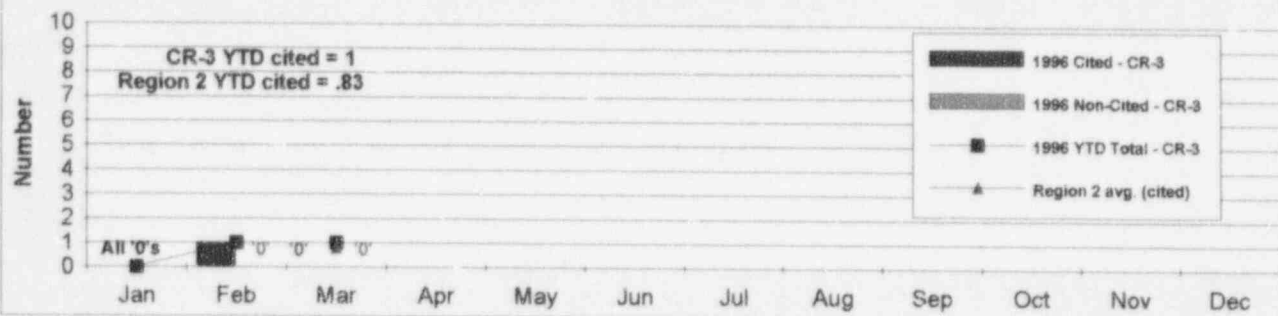
Achieve an Unplanned Automatic Scrams per 7000 Hours Critical target of less than 1.0.

Analysis / Summary

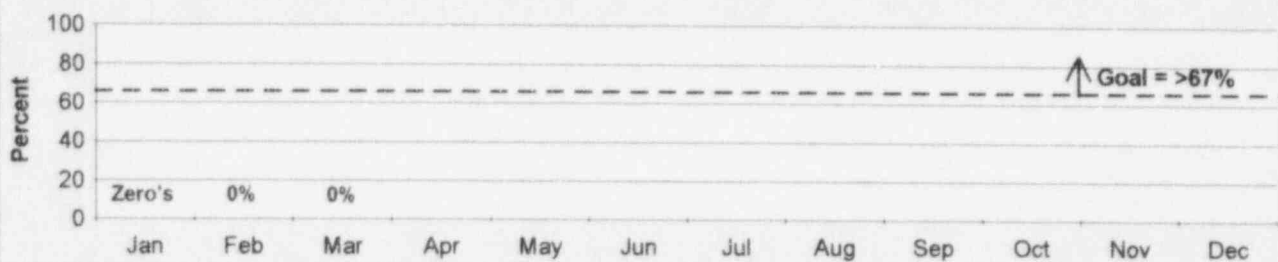
There have been zero unplanned automatic scrams during the first quarter. The last unplanned automatic scram at CR-3 was on September 18, 1993.



1996 NRC Violations - CR-3



Ratio of Non-Cited Violations/Total Violations - 1996



Definition of the Performance Indicator

This indicator trends two items: a) cited and non-cited NRC violations as they are identified in formal NRC inspection reports, and b) the ratio of non-cited to total number of violations. This trend will be for violations resulting from 1996 activities only.

The Region 2 average comes from data supplied by International Energy Services. The data is obtained from formal Inspection Reports that have been electronically recorded in the NRC public document room.

Performance Measurement / Goal

- a) Maintain the number of cited violations, "resulting from 1996 work activities", below the Region 2 average.
- b) Improve the ratio of non-cited (i.e., self-identified) violations to total violations to >67%.

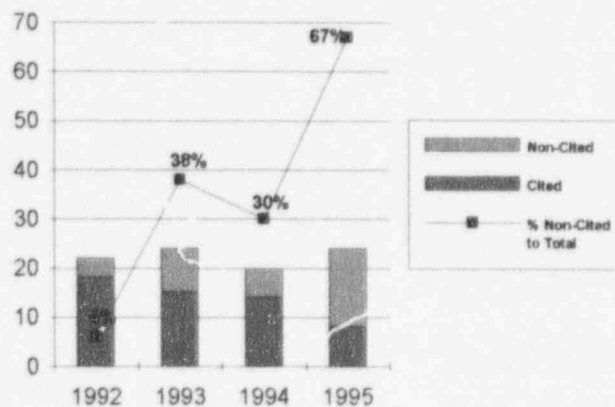
Analysis / Summary

There have been two (2) NRC Inspection Reports received in the first quarter. They were:

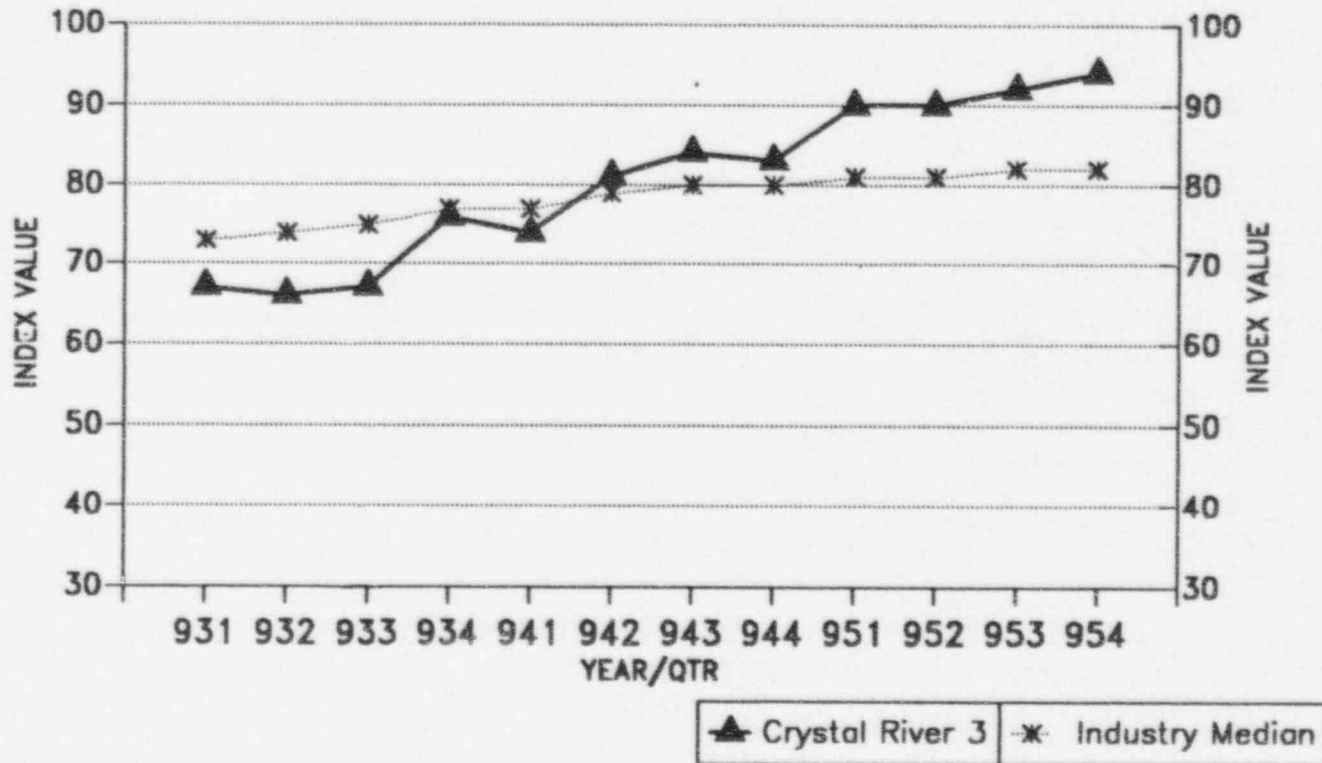
Inspection Report 95-021 - This IR was a routine resident inspection covering the time period Dec. 17, 1995 through Jan. 27, 1996. It identified one cited (Level IV) and one non-cited violation, BUT only the cited violation was from 1996 and included in this trend. This results in a ratio of zero non-cited violations to one total for year-to-date or zero percent for February.

Inspection Report 95-022 - This IR was a special team inspection conducted on Dec. 11 - 15, 1995. The report identifies four "apparent" violations being considered. All four are relative to 1994 work activities relative to makeup tank issues.

Annual Performance Summary

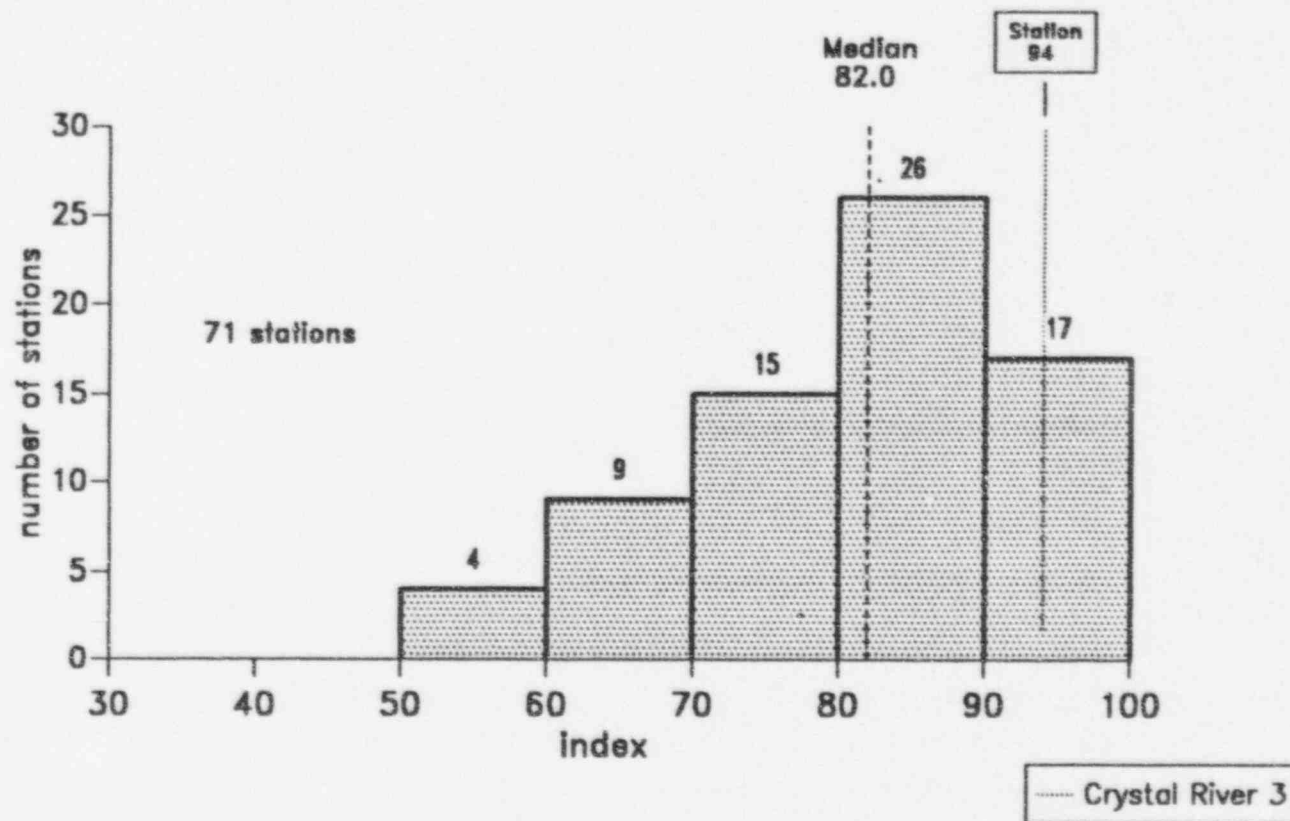


Performance Indicator Index Trend (Station Values)



For the index calculation unit capability factor, unplanned capability loss factor, unplanned automatic scrams per 7000 hours critical, safety system performance, collective radiation exposure, and volume of low-level solid radioactive waste indicators are calculated for a two year period instead of the normal three year period to allow the index trend to be more responsive to changes in plant performance.

Performance Indicator Indexes Data Through Fourth Quarter 1995



For the index calculation unit capability factor, unplanned capability loss factor, unplanned automatic scrams per 7000 hours critical, safety system performance, collective radiation exposure, and volume of low-level solid radioactive waste indicators are calculated for a two year period instead of the normal three year period to allow the index trend to be more responsive to changes in plant performance.

PLANT PERFORMANCE INDICATOR INDEX - PWR

DATE: 03/05/96

PLANT: Crystal River 3		Unit 3								
OVERALL PERFORMANCE INDICATOR	WEIGHT	VALUE	INDEX	PRODUCT	VALUE	INDEX	PRODUCT	VALUE	INDEX	PRODUCT
Unit Capability Factor (2yr)	0.16	90.8	100.0	16.0						
Unpl. Cap. Loss Factor (2yr)	0.12	0.6	95.8	11.5						
Unplanned Auto. Scrams (2yr)	0.08	0.0	100.0	8.0						
Safety System Performance:										
PWR High Press. Inj. (2yr)	0.09	0.009	100.0	9.0						
PWR Aux. Feedwater (2yr)	0.09	0.007	100.0	9.0						
Emergency AC Power (2yr)	0.09	0.011	98.3	8.9						
Thermal Performance (1yr)	0.06	99.7	84.4	5.1						
Fuel Rel. (most recent qtr)	0.07	3.8E-04	100.0	7.0						
Chemistry Perf. Ind. (1yr)	0.06	1.21	83.5	5.0						
Coll. Radiation Exposure (2yr)	0.08	118	93.9	7.5						
Low Lev. Rad. Waste Vol. (2yr)	0.05	37	100.0	5.0						
Ind. Safety Acc. Rate (1yr)	0.05	1.27	43.0	2.1						
				WEIGHTED INDEX	94.0	WEIGHTED INDEX				WEIGHTED INDEX
				NORM. INDEX	94.0	NORM. INDEX				NORM. INDEX

AVERAGE STATION INDEX = 94

Commercial Dates:

 Unit 3: 03/13/1977

Notes:

- Indicator values are based on data through the 4th quarter of 1995.
- Performance Indicator Index values use the Chemistry Performance Indicator beginning with first quarter 1995. Values prior to 1995 use the Chemistry Index.

Summary Comparative Performance Indicator Report
Data through: 12/95

Utility: Florida Power Corporation
Unit: Crystal River 3 3

Date: 03/06/96

Position in Industry Distribution
(Note 1)

PERFORMANCE INDICATORS	Unit or Station Value	Position in Industry Distribution (Note 1)	
		----- Better Performance ----->	Median
Unit Capability Factor (unit percent, three-year average)	88.6		
Unplanned Capability Loss Factor (unit percent, three-year average)	0.8		
Unplanned Automatic Scrams per 7000 Hours Critical (unit rate, three-year average)	0.3		
Safety System Performance (three-year average) (Note 2)			
High Pressure Safety Injection System - PWR (unit value)	0.012		
Auxiliary Feedwater System - PWR (unit value)	0.007		
Emergency AC Power System (station value)	0.009		
Thermal Performance (ratio of design to actual gross heat rate, unit percent)	99.7		
Fuel Reliability - PWR (unit microcuries/gm) (Note 3)	3.8E-04		
Chemistry Index - PWR once-through with morpholine (unit value) (Note 4)	0.64		
Collective Radiation Exposure - PWR (man-rem per unit per year, three-year average)	99		
Volume of Low-level Solid Radioactive Waste - PWR (cubic meters per unit per year, three-year average)	59		
Industrial Safety Accident Rate (station rate per 200,000 man-hours worked)	7		

G = 1995 U.S. industry goal P = Plant Value R = Fuel Defect Reference Value

Design Basis Issues/Resource Management

- Resources are being challenged due to the number of design basis issues identified
- Issues are primarily a result of existing programs and initiatives
- Resources are based upon safety significance and plant need as determined by:
 - » routine management oversight
 - » monthly Engineering priority meetings
 - » monthly reviews of operator work around list
 - » problem reporting process
- Planned enhancements:
 - » post 10R outage will develop an integrated plan to enhance prioritization of issues
 - » engineering resource loading is being developed

Design Basis Issues

- Significant Items

- » Currently active:

- ITS Setpoints
- Tank Calcs.
- EOP Review
- TSC Ventilation
- CREVs
- HPI Instrumentation
- MUT Issue
- REA Backlog

- » New:

- GL96-01
- FSAR Review/50.59 issue
- IPAP

Design Basis Issues

- Significant Items (cont'd)
 - » Closed:
 - 89-10 MOV Testing
 - 89-13 Service Water
 - 18-24 month Surveillance Extension
 - » Cancelled:
 - Power Level Upgrade
 - License Renewal

Design Basis Issues/Resource Management

- Issues are being addressed primarily with in-house resources augmented with contractor support
- Some support is being provided by A/E
- Direct FPC supervision of activities and performing work in-house has advantages
 - » quality of the products is controlled
 - » retains expertise & knowledge
 - » allows increase interaction with other department's

CR-3 OPERATIONS

- SRO CANDIDATES-13 in 24 months
 - » 6 Plant Engineers
 - » 4 Current ROs to be upgraded
 - » 3 Outside hire engineers

- RO POSITIONS
 - » 6 New positions

- ANSS-SRO CERTIFIED POSITION CREATED
 - » 1 Per shift within 24 months
 - » Fire team leader, qualified reviewer, planning qualified
 - » Will make notifications during events - plant and simulator
 - » Will control personnel entrance into the control room

CR-3 OPERATIONS

- ROTATIONS

- » 3 this cycle if current candidates receive SROs (Projects, Quality Programs and Training)

- MENTOR PROGRAM

- » Senior Management (VPs and Directors) will be NSS mentors

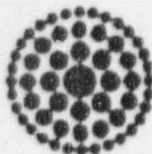
- PROCEDURES

- » EOP Enhancement
- » AP review and development in process
- » OP backlog

- NON-LICENSED OPERATORS

- » Selection standard upgraded

INTEROFFICE CORRESPONDENCE



Florida
Power
CORPORATION

Nuclear Operations
Office

NR3B
KAC

240-3300
Telephone

SUBJECT: EOP Enhancement Program Status Report as of 03/14/96

TO: B.J.Hickle
EOP Issue Sponsor

DATE: March 14, 1996
OP96-0035

The attached schedule provides an overview of the progress of the EOP Enhancement Program (Phase 2).

The draft procedure revisions are nearly complete. A new item has been added to the schedule to perform a "table top" review of the draft procedure revisions to ensure they meet management expectations prior to performing validation and verification activities. Paul Fleming, John Lind, Brent Brooks (BWNT) and myself will perform a detailed review of the drafts during the week of 3/18/96.

The EOP setpoint validation effort is essentially complete however, a number of open items regarding these setpoints still exists. We have prioritized all the open issues and a detailed review of the open items list was performed by a project team on 2/28/96 per your request. Results of that meeting have been presented to Nuclear Operations management on March 1, 1996. It is now recognized that a number of technical issues will remain open even after the completion of the Phase 2 effort. This is due to resource limitations in Engineering at the current time.

Configuration management has agreed to take ownership of the Setpoint and Step data base at the completion of this effort.

Mr. Beard, Mr. Boldt, and Mr. Tanguay attended an overview meeting of our program with the EOP Group on 3/6/96. At that meeting we presented the current status of the Enhancement Program, current challenges, our vision of the future for EOP maintenance, and answered related questions. We appreciate the opportunity to discuss our program with upper management as it demonstrates a sincere interest in the importance of this efforts.

Based on scheduled tasks completed to date, I estimate that the EOP Enhancement Program is 46% complete. If you need further information, please advise.


G.A. Becker
EOP Project Manager

xc: P.M.Beard
G.L.Boldt
P.R.Tanguay
L.C.Kelley
R.W.Davis
R.D.Demontfort
C.W.Bergstrom
G.P.Hebb
J.Lind
J.G.Smith
J.L.Springer
J.R.Maseda
R.W.Kno11 (NU47)
R.F.Bremer (NU47)
M.S.Kelly (NU47)
K.C.Campbell(NU47)
R.O.Enfinger
P.V.Fleming

B.Gutherman
F.X.Sullivan
Ross Butcher (NRC)
Records Management
File

EOP Enhancement Program Phase 2 (Rev2.)

ID	Task Name	Duration	Start	1996											
				Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
1	Draft EOP Changes	173d	Tue 8/1/95	[Task bar spanning from Aug to Mar]											
2	EOP-03 ISCM	40d	Tue 8/1/95	[Task bar from Aug to Oct, labeled Kelly]											
3	EOP-05 EHT	15d	Mon 9/25/95	[Task bar from Oct to Nov, labeled Bremer]											
4	EOP-06 SGTR	30d	Tue 9/26/95	[Task bar from Oct to Dec, labeled Kelly]											
6	EOP-04 IHT	15d	Mon 10/16/95	[Task bar from Nov to Dec, labeled Bremer]											
6	EOP-07 ICC	15d	Mon 11/6/95	[Task bar from Dec to Jan, labeled Bremer]											
7	EOP-08 LOCA C/D	40d	Tue 11/7/95	[Task bar from Dec to Feb, labeled Kelly]											
8	EOP-09 NC C/D	25d	Wed 11/29/95	[Task bar from Jan to Feb, labeled Bremer]											
9	EOP-14 Enclosures	24d	Mon 1/8/96	[Task bar from Jan to Feb, labeled Bremer]											
10	EOP-11 LDHR	20d	Tue 1/9/96	[Task bar from Jan to Feb, labeled Kelly]											
11	EOP-12 SBO	20d	Tue 2/6/96	[Task bar from Feb to Mar, labeled Kelly]											
12	EOP-01 Entry Cond	5d	Fri 2/9/96	[Task bar from Feb to Feb, labeled Bremer]											
13	EOP-10 PTStabil	20d	Fri 2/16/96	[Task bar from Feb to Mar, labeled Bremer]											

Rev. 2 issued 11/29/95 to separate setpoint and step validation effort into 2 separate tasks
 Date Thu 3/14/96

Task		Summary	
Critical		Rolled Up Task	
Progress		Rolled Up Milestone	
Milestone		Rolled Up Progress	

EOP Enhancement Program Phase 2 (Rev2.)

ID	Task Name	Duration	Start	1996													
				Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
27	Incorporate Verification Comments	20d	Fri 6/28/96														6/28 7/26 EOP Group
28	Revise Cross Step Doc.	20d	Fri 7/26/96														7/26 8/22 Contractor/EOP Group/Clerk
29	Train Crews Cycle 4 equal	6w	Mon 8/5/96														8/5 9/13 Smith/Springer
30	Qualified Review	10d	Fri 8/23/96														8/23 8/5 Bremer/QR's
31	PRC Approval	0d	Thu 9/5/96														9/5 9/5 PRC/Becker
32	Issue EOP Revisions	3d	Mon 9/16/96														9/16 9/18 Doc. Control

Rev 2 issued 11/29/95 to separate setpoint and step validation effort into 2 separate tasks
Date Thu 3/14/96

Task	Summary
Critical	Rolled Up Task
Progress	Rolled Up Milestone
Milestone	Rolled Up Progress

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50.59 REVIEW

- » Current Process is NSAC 125-Based
- » Review of 50.59 Process Began 2/96
 - Full-time Effort Using
Engineering Supervisor
Regulation
Department Procedure
(NOD-11)
Other Implementing
Procedures (5)
- » 50.59 Procedures From Other Plants
Reviewed
- » NRR Project Manager Inspection
4/9/96 - 4/12/96
- » Findings of Internal Review Matched
Many PM Findings
- » Additional PM Comments Will Be
Considered

50.59 REVIEW

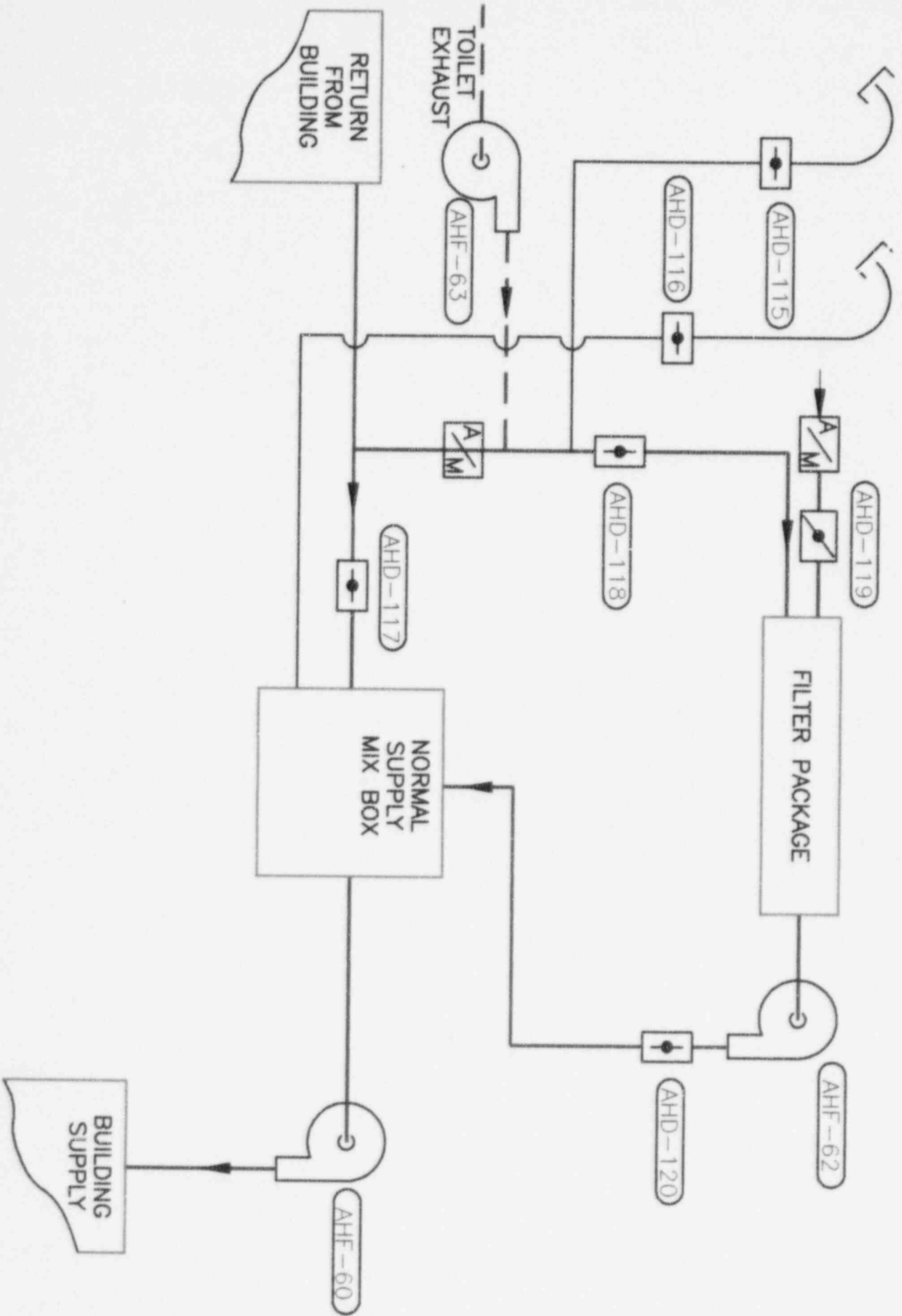
- » Preliminary Internal Findings
 - NOD-11 Needs Improvement
 - Definitions
 - Screening Criteria
 - Management Directives
 - (Must Do 50.59)
 - Training/Qualification
 - May Need Single Point Implementation
 - Procedure
 - Flow Chart Concept

- » NEI Task Force
 - Industry and NRC Concern
 - FPC Participating
 - NRC Contact (C. Ashfield)
 - Recommendations acceptable to NRC
and Industry

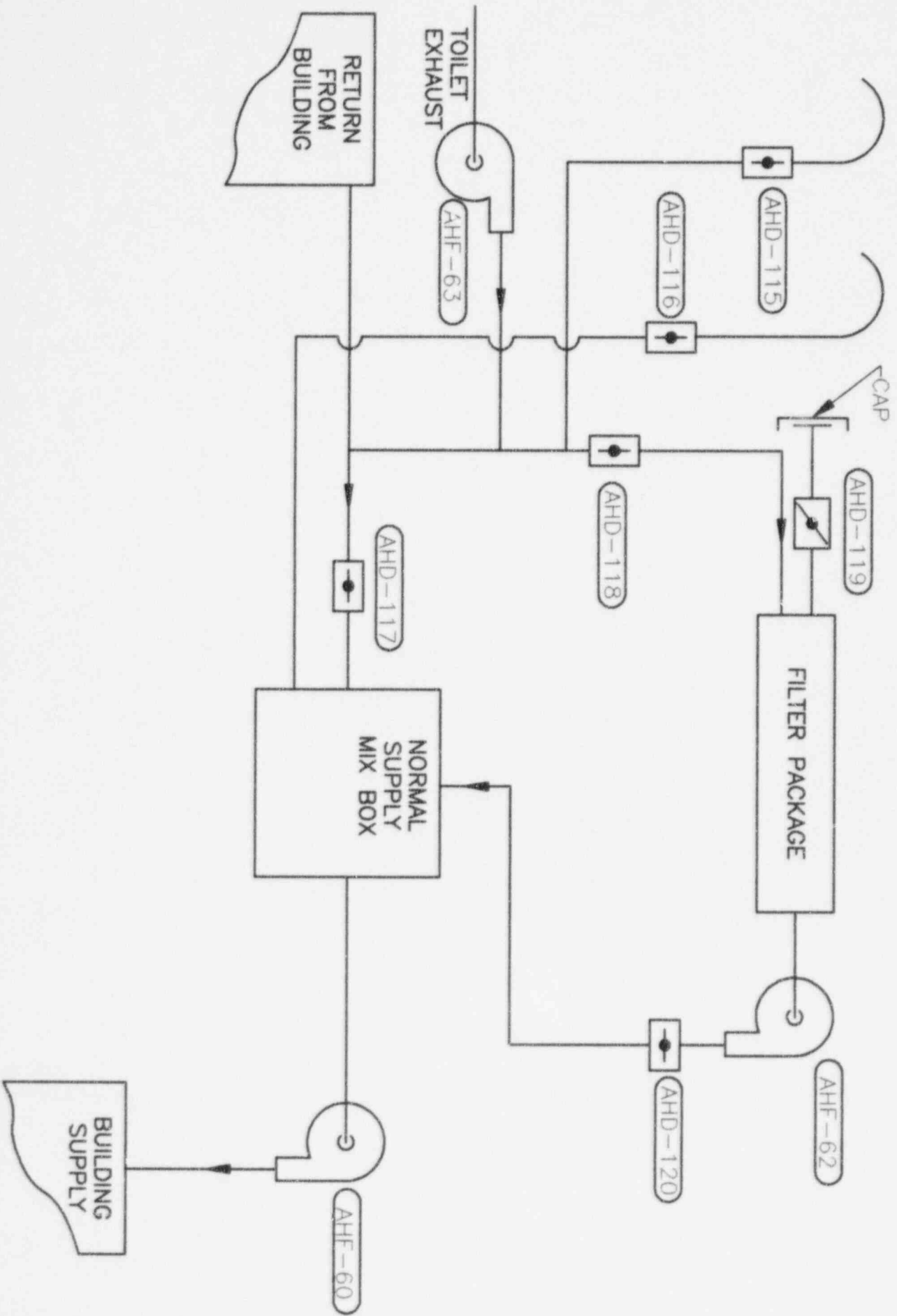
TSC Ventilation Status

- Covers have been installed on the roof top air intake ducts
- Outside air intake has been changed to be from inside the equipment room
- Air intake duct size was reduced to increase air velocity
 - » permanent air flow instrumentation has been installed
- Post modification testing has yielded acceptable and repeatable results
- Analyses to address humidity and dose considerations are being finalized
 - » results appear to be acceptable

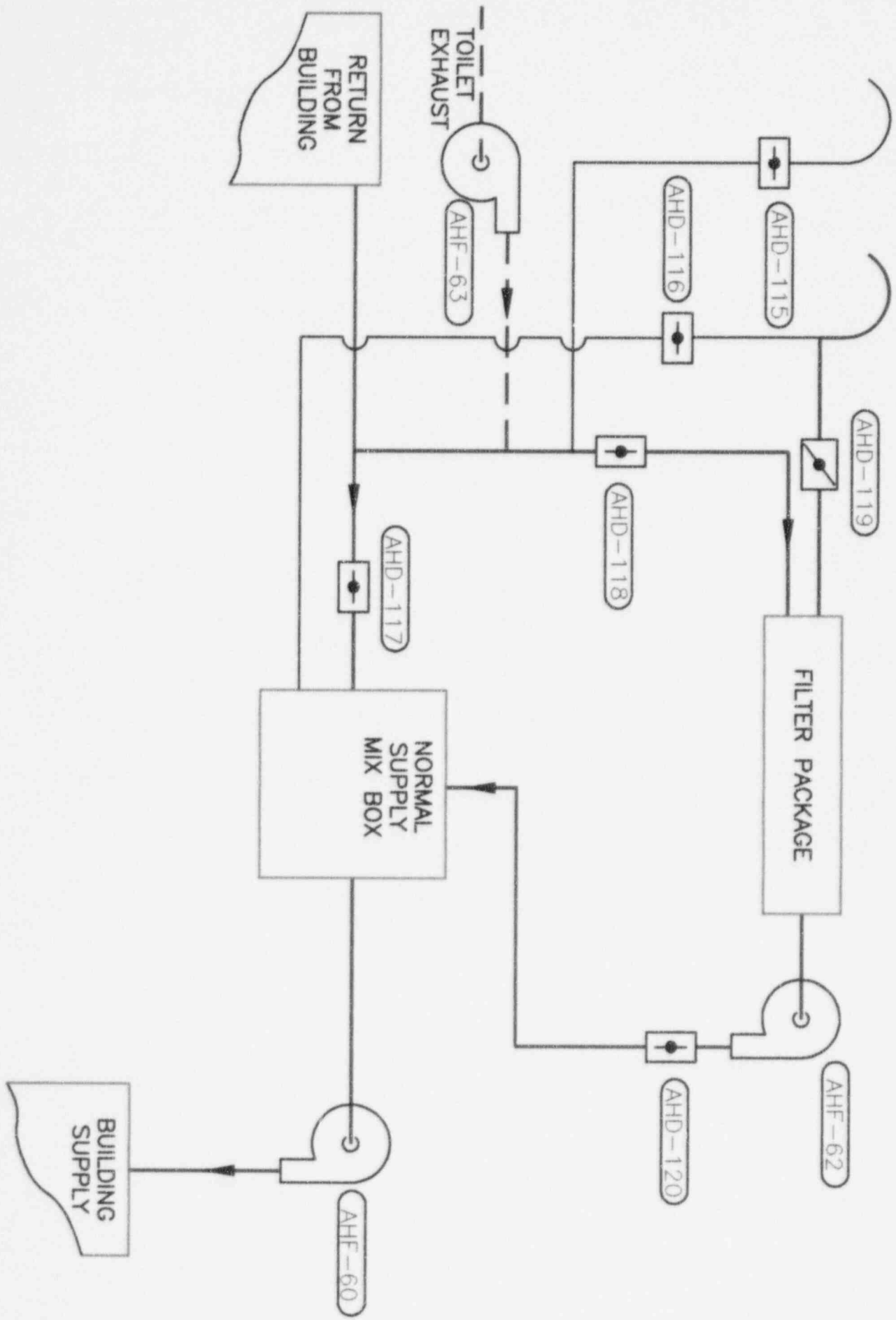
NEW EMERGENCY MODE



NORMAL MODE



OLD EMERGENCY MODE



OTSG NDE Issue

- 10R Commitments:
 - » criteria limited to first span, pit-like IGA indications
 - » plug any tubes that exceed the new 1.25 volts limit (bobbin coil probe)
 - » perform an insitu pressure test on 13 tubes with 74 known indications
 - 3 exceeded plugging limit
 - » notify the NRC of 10R inspection results/findings prior to entering MODE 4
 - number of tubes plugged and sleeved
 - crack-like indications in the first span
 - assessment of growth for first span IGA indications
 - results of in-situ pressure testing

OTSG NDE 10R Results

- 21% of OTSG tubes were inspected
- total of 44 tubes were plugged
 - 26 in "A" OTSG
 - 18 in "B" OTSG
- no tubes were sleeved
- no crack-like indications were found in the first span
- review of inspection data from 1992, 1994 and 1996 did not reveal any growth of first span indications
- insitu pressure testing of 74 indications at >2900 psig did not indicate any leakage
- insitu results support 95/95 probability/confidence of no leakage in first span indications at MSLB conditions
- to address the remaining 5% of the tubes an analysis was done to show that 10CFR100 limits would not be exceeded following a MSLB
 - » assumed 100 gpm primary to secondary leak

CR-3 FSAR REVIEW

BACKGROUND: FSAR accuracy
implications from the Millstone Event.

» Subsequent Review of CR-3 Spent
Fuel Section of the FSAR.

OBJECTIVE: Assure a high level of
confidence that operating practices at
CR-3 are in compliance with the FSAR.

CR-3

FSAR REVIEW

SCOPE: A systematic review of the FSAR focusing on the plant systems chapters with the appropriate plant implementing procedures, design bases document, and technical specifications.

RESOURCES: Two people full time with one additional person 75% of the time.

» Additional corrective action resources will be assigned as required.

CR-3

FSAR REVIEW

SCHEDULE: A pilot review is underway on the Makeup System and the Decay Heat Removal System. After completion and review of the pilot, a target schedule will be developed. The schedule for corrective action will be based on the number and severity of the findings.

CURRENT PROGRESS: The Makeup System and the Decay Heat System are nearing completion. We have identified approximately 32 findings.

- » A corrective action control process has been established to resolve findings.

CR-3

FSAR REVIEW

- » Findings are categorized into 5 categories ranging from editorial to deviations clearly not bounded by FSAR descriptions. We have not found any deviations not bounded by the FSAR.
- » A problem report has been written addressing the category C deviation identified so far.
- » A comprehensive action plan is being developed which will include appropriate documentation and dispositioning requirements.