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Docket No. 50-302

MEMORANDUM FOR: Richard Lewis, Director
Division of Reactor Projects
Region II

FROM: Harley Silver, Project Manager
Operating Reactors Branch No. 4
Division of Licensing

SUBJECT: NRR SALP INPUT - CRYSTAL RIVER 3 NUCLEAR GENERATING
PLANT, FLORIDA POWER CORPORATION

Enclosed is the NRR input for the current SALP report for the Crystal River 3 Nuclear Generating Station covering the period from July 1, 1983 to October 31, 1984. The input was prepared in response to your memorandum of November 5, 1984, and is in accordance with NRC Manual Chapter 0516. The report contains enclosures that provide background of activities, reviewer ratings and licensing actions used in preparing the report.

We request that your final report include information provided in Section IV Performance Analysis; Section V, Conclusion; and Appendix B, Supporting Data and Summary.

"ORIGINAL SIGNED BY:"

Harley Silver, Project Manager
Operating Reactors Branch No. 4
Division of Licensing

Enclosure:
As stated

cc w/enclosure:
D. Eisenhut
G. Lainas
T. Stetka, SRI
J. Stolz
D. Ziemann
D. Price, RII

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Q PDR

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HSilver/pn
11/28/84

ORB#4:DL
JStolz
11/28/84

AD:OR:DL
GLainas
11/28/84

FACILITY: Crystal River Unit 3 Nuclear Generating Plant
LICENSEE: Florida Power Corporation
NRR Project Manager: Harley Silver

I. Introduction

This report presents the results of an evaluation of the licensee, Florida Power Corporation, in the functional area of licensing activities. It provides NRR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period July 1, 1983 to October 31, 1984.

The approach used for this evaluation was to select a number of licensing issues which involved a significant amount of staff effort or which related to important safety or regulatory issues for the period from July 1, 1983 to October 31, 1984. Comments were then solicited from staff members who were involved with that issue. In most cases the staff applied the evaluation criteria for the performance attributes based on their firsthand experience with the licensee or with the licensee's submittals. For the evaluation interval after 1983, each organization responsible for developing a safety evaluation provided SALP input in accordance with Office Letter No. 44. This input was accumulated and used directly. However, for certain licensing actions an evaluation by the Project Manager was also included.

The individual SALP evaluations for each rated licensing issue were assembled into a matrix which was then used with appropriate weighting for the importance of the licensing issue to safety to develop the overall evaluation of the licensee's performance.

This approach is consistent with NRC Manual Chapter 0516 which specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating is to be tempered with judgement as to the significance of the individual elements.

II. Summary of Results

Based on the approach described in the Introduction, the performance of Florida Power Corporation in the functional area - Licensing Activities - is rated Category 2. There was a slight improvement in performance from the previous evaluation period in which the licensee was also rated Category 2. The improvement is noted in all three of the attributes generally entering into the evaluation.

III. Criteria

Evaluation criteria as given in NRC Manual Chapter 0516 Table I were used in this evaluation. Weightings were used to temper the evaluation of each individual licensing issue depending upon its importance to safety.

IV. Performance Analyses

Generally, the licensee's performance was evaluated for three of the seven attributes specified in Manual Chapter 0516. These are:

- Management involvement and control in assuring quality
- Approach to resolution of technical issues from a safety standpoint
- Responsiveness to NRC initiatives

For one licensing issue, an evaluation of the licensee's staffing, reportable event and training was provided. There is no basis for an evaluation of licensing performance for the remaining attribute - enforcement history.

This performance assessment is based on our evaluation of the licensee's performance in support of licensing actions that had a significant level of activity during the evaluation period. These actions included licensee requests for license amendments and for exemptions or relief from regulatory requirements, responses to generic letters, and various submittals of information for multi-plant and TMI items. Active actions during this period are classified below. A total of 39 licensing actions were completed.

- o 23 Plant-specific actions (19 completed): Included in this category which were used to provide input to this evaluation are:
 - On-line ES Logic Testing
 - Fuel Pool Enrichment Limit
 - Proposed Alternate Off-site Power Supply
 - Decay Heat Removal System
 - Administrative Control of Containment Isolation Valves
 - Physical Security Plan Revisions
 - High Radiation Area TS
 - Steam Generator Operating Level Limits
 - Auxiliary Building Ventilation System TS
- o 16 Multi-plant actions (9 completed): Included in this category which were used to provide input for this evaluation are:
 - Control of Heavy Loads
 - Masonry Wall Design
 - Automatic Actuation of Shunt Trip Attachment
 - Environmental Qualification of Safety-Related Electrical Equipment
 - Appendix I Review
 - Asymmetric LOCA Loads
- o 18 TMI (NUREG-0737) actions (11 completed): Included in this category which were used to provide input for this evaluation

are as follows. For other actions during this period, licensee participation was not involved and no SALP evaluation is included.

- Post-Accident Sampling Modifications
- Auxiliary Feedwater System Evaluation
- High Point Vents
- ECC System Outages

In addition to these specific issues, the licensee was evaluated for overall general performance on the many day to day issues which arise.

A. Management Involvement and Control in Assuring Quality

Overall rating for this attribute is Category 2. Licensee has continued to modify its management structure by adding a layer of management between the licensing and engineering organizations and the Vice President, Nuclear, which has the effect of permitting increased attention to these organizations by management. In addition, the licensee has developed an effective computerized tracking system for its NRC commitments, and an excellent program to track progress on items in the equipment qualification program. Based on the evaluations for specific issued where a bases existed for judging this attribute, and on judgements of overall and day-to-day activities, improvement has been noted in the extent and consistency of management involvement and control since the last SALP report. This is illustrated by the demonstrated increased management involvement brought to bear in finally resolving the auxiliary feedwater system issues, and by the aggressive and effective performance in resolving environmental qualification issues. A logical extension of these approaches would include application to integrated schedules for all principal plant activities.

Other tasks have indicated management involvement ratings as about evenly divided between Category 1 and Category 2, and in no case was this attribute rated Category 3.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

Overall rating for this attribute is Category 2. In general, the licensee's approach to resolution of technical issues demonstrated an adequate understanding of those issues and resulted in sound, timely, viable, and conservative resolutions. This was especially true in the area of environmental qualification, where licensee's action was prompt and effective in producing sound substantiation of qualification. However, in some areas, this was not always the case. Licensee's approaches to resolution of issues sometimes lacked thoroughness

and depth. For example, in the Technical Specification amendment for the Decay Heat Removal System, the licensee's submittal did not include an adequate safety evaluation. In its original proposal for modified steam generator operating level limits, the licensee requested a maximum level which had not been shown to be acceptable, and in the issue of alternate off-site power supply, the licensee initially and unnecessarily requested an emergency technical specification. Finally, the licensee's approach to its request to vent the containment through the "mini-purge" lines on a one-time basis to relieve high containment pressure did not indicate that adequate prior planning had taken place to avoid the problem or that the proposed resolution had been thoroughly thought through. In all the cases which have completed, adequate resolution was attained after interaction with the staff.

C. Responsiveness

The overall rating for this attribute is Category 2; however, the ratings for individual licensing actions indicates improvement from the Category 2 rating of the last SALP evaluation. For example, responsiveness in the area of the auxiliary feedwater system evaluation was considerably improved, leading to timely resolution of outstanding issues. Likewise, the licensee responded quickly and well to the environmental qualification meeting and to subsequent staff requests for additional information. Several other individual actions were rated highly with regard to this attribute, and responsiveness for the majority of actions were described as adequate. On the other hand, the licensee required frequent extensions of time to respond to our requests for additional information regarding the post-accident sampling system review. Unresolved issues still remain in this area.

D. Enforcement History

There was no basis for an NRR evaluation of this attribute.

E. Reportable Events

There was no important basis for an NRR evaluation of this attribute. Only one action, Physical Security Plan Revisions, was evaluated (rated highly) for this attribute.

F. Staffing

There was no important basis for an NRR evaluation of this attribute. Only one action, Physical Security Plan Revisions, was evaluated (rated adequate) for this attribute.

In general, staffing with respect to licensing matters is adequate and improving. In addition to management changes previously discussed, licensee staff members have effectively interacted with NRR staff without identified inadequacies.

G. Training

There was no important basis for NRR evaluation of this attribute since only one action, Physical Security Plan Revisions, was evaluated (rated adequate) for this attribute.

V. Conclusion

Based on our evaluation, an overall performance rating of Category 2 is determined for Florida Power Corporation's licensing performance for the period July 1, 1983 through October 31, 1984.

Appendix A
Evaluation Matrix for Individual
Licensing Actions

Review Branch	Licens. Action TAC No.	Management Involvement	Approach to Resolution	Responsive-ness	Enforcement History	Reportable Events	Staffing	Training
ASB Singh	07983 Control of Heavy Loads	NB	2	2	NB	NB	NB	NB
MEB Rajan	08843 Asymmetric LOCA Loads	NA	2	2	NB	NB	NB	NB
METB Willis	08985 Appendix I Review	2	2	2	NB	NB	NB	NB
PSB Knight	12743 Elect. Dist. System	1	1	2	NB	NB	NB	NB
EOB Hernan Shemanski	42512 EQ	1	1	1	NB	NB	NB	NB
SEB Chokshi	42902 Masonry Wall Design	NB	1	2	NB	NB	NB	NB
RSB Hernan	44363 Reactor Coolant System High Point Vents	2	2	2	NB	NB	NB	NB
CHEB Wing	44431 PASS Modifications	NB	2	3	NB	NB	NB	NB
ASB Fioravante	44668 ASW System Evaluation	1	2	1	NB	NB	NB	NB
RSB Herman	45619 ECC System Outages	2	2	2	NB	NB	NB	NB

Review Branch	Licens. Action TAC No.	Management Involvement	Approach to Resolution	Responsive-ness	Enforcement History	Reportable Events	Staffing	Training
PRSLB Gaskin	48450 Physical Security Plan Revisions	2	3	2	NB	1	2	2
RAB Hinson	49988 High Radiation Area Tech Spec	NB	1	1	NB	NB	NB	NB
RSB Dunning Marinos	52669 ES Actuation Logic	2	2	2	NB	NB	NB	NB
PSB Tichan	53169 Automatic Shunt Trip for RTB's	NA	1	1	NB	NB	NB	NB
CPB Brooks	53330 Fuel Pool Enrichment Limit	1	1	NB	NB	NB	NB	NB
RSB Hernan Jensen	54175 Steam Generator Operating Level Limits	2	2	1	NB	NB	NB	NB
RSB Jensen	54445 Decay Heat Removal System	NB	3	2	NB	NB	NB	NB
R:II Rogge Stetka	54892 Administrative Control of Containment Isolation Valves	2	2	2	NB	NB	NB	NB
AEB ASB Silver	55825 Auxiliary Building Ventilation System TS	2	3	2	NB	NB	NB	NB

Appendix B - NRR Supporting Data and Summary

This section provides a summary of significant licensing actions and other activities during the SALP evaluation period

1. NRR/Licensee Meetings - 4
Reactor head vent exemption
Technical and schedular discussions on fire protection program corrective actions
Environmental qualification of electrical equipment
Frequency of ESF Testing
2. NRR site visits - 4
General licensing discussions with licensee and resident inspector
SALP meeting
Discuss Auxiliary Feedwater System
Annual Emergency Drill Observation
3. Commission briefings - None
4. Schedule extensions granted - 2
Reactor Head Vent Installation
NUREG-0737 Supplement 1 Implementation
5. Reliefs granted - None
6. Exemptions granted - 1
Schedule exemption for reactor vessel head vent
7. License amendments issued - 11
8. Emergency Technical Specification changes issued - None
9. Orders issued - 1
Confirmatory Order on NUREG-0737 Supplement 1
10. NRR/licensee management conferences - None
(NRR staff attended one Region 3 conference with licensee's management.)