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Florida Power
CORPORATION

February 11, 1985
3F0285-09

Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 84-29
Revised Response

Dear Sir:

In discussions with Mr. V. Panciera and Mr. T. Stetka of your staff, the need for a revised response to the subject inspection report was identified. Transmitted herewith is the revised Florida Power Corporation response to IE Inspection Report No. 84-29.

Sincerely,

G. R. Westafer

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

DG:mlg

Attachment

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 84-29

VIOLATION 84-29-01

Technical Specification 6.8.1 requires adherence to procedures used to accomplish surveillance activities required by Regulatory Guide 1.33, November 1972, and Technical Specification 6.8.1.c.

Surveillance Procedure SP-154 directs the functional testing of the seismic monitoring instrumentation, and Surveillance Procedure SP-317 directs the performance of a leak rate determination for the reactor coolant system.

Contrary to the above:

1) On October 12, 1984, procedure SP-154 was not adhered to in that step 6.1.1.6, which requires the performance of procedure SP-336 to check operability of the system, was not performed even though the step was signed as completed by the maintenance and quality control personnel. In addition, review of records for the period of April 20, 1982 through the present indicates a history of a failure to perform step 6.1.1.6, even though appropriate completion signatures were recorded.

2) On September 28, 1984, procedure SP-317 was not adhered to in that data sheet enclosure 3 was completed using incorrect data (the results were calculated with a valve, RCV-150, closed, whereas the valve was open). In addition, subsequent supervisory review failed to identify the data error.

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

RESPONSE (ITEM 1)

1. **FLORIDA POWER CORPORATION POSITION:**

   Florida Power Corporation (FPC) accepts the stated violation described in paragraph (1) above.

2. **APPARENT CAUSE OF VIOLATION:**

   The cause of this violation is inadequate procedures, in that SP-154 specified that Operations restore the seismic instrumentation in accordance with SP-336 steps 6.2.3 - 6.2.7, and there is not adequate documentation of the completion of these steps.

3. **CORRECTIVE ACTION:**

   FPC will revise SP-154 to incorporate the appropriate steps from SP-336 to restore the system and omit the reference to SP-336. The revision will also

delete the statement having Operations restore the instrumentation. The instrumentation will be restored by the personnel performing the surveillance.

4. **ACTION TO PREVENT RECURRENCE:**

Personnel have been instructed to read all procedures more carefully and the subject procedure(s) is being revised.

5. **DATE OF FULL COMPLIANCE:**

FPC will be in full compliance upon implementation of the procedural changes which should be by July 15, 1985.

RESPONSE (ITEM 2)

1. **FLORIDA POWER CORPORATION POSITION:**

FPC concurs with the NRC's assessment described in paragraph (2) above.

2. **APPARENT CAUSE OF VIOLATION:**

The leakage for RCV-150 was incorrectly placed on the data sheet on the "closed" line rather than on the line designated for "open". This occurred because the data sheet is unclear as to which line should be used. Supervisory personnel reviewed the data sheet to assure the data did not exceed Technical Specification limits, and subsequently missed the fact that the data had been recorded incorrectly.

3. **CORRECTIVE ACTIONS:**

The September 28, 1984 data sheets for SP-317 were corrected to reflect the appropriate data and the leakage was recalculated. The results were reviewed to ensure that the Technical Specification limits were not exceeded.

4. **ACTION TAKEN TO PREVENT RECURRENCE:**

SP-317 has been revised to clarify Enclosure 3's description of when RCV-150 is closed or open. Appropriate personnel have been reinstructed on the importance of placing data correctly and reviewing thoroughly.

5. **DATE OF FULL COMPLIANCE:**

FPC was in full compliance upon implementation of the changes made to SP-317. This occurred on January 3, 1985.