

*Official File Copy*

SEP 12 1984

Florida Power Corporation  
ATTN: Mr. W. S. Wilgus  
Vice President Nuclear Operations  
P. O. Box 14042, M.A.C. H-2  
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: REPORT NO. 50-302/84-09

Thank you for your response of May 18, 1984, to our Notice of Violation issued on April 19, 1984, concerning activities conducted under NRC Operating License No. DPR-72.

With regard to Deviation 84-09-02, we continue to assert that you did deviate from your commitment in FSAR Section 9.7.2.1.g. We note that the administrative controls discussed in the FSAR and as quoted in your response refer to the starting of the "emergency system." Since the emergency system consists of the ventilation dampers arranged to provide a recirculation flow, which includes the emergency fans (AHF-18A or AHF-18B) and the emergency filter banks (AHFL-4A or AHFL-4B), starting of this system must include the initiation of all these functions. We do not agree that item 2 in your response represents emergency system operation since the emergency fans which flow through their associated HEPA and charcoal filter banks have not been started.

Florida Power Company's position that RMA-5 must be challenged before administrative actions are taken to start the emergency system is considered to be nonconservative. Time permitting, the NRC encourages operator action to be taken before a safety system is challenged to insure that protective actions are being accomplished.

Our review of your response to Violation 84-09-06 does not change our position that the violation did occur. The purpose of the control room emergency ventilation systems, as stated in the FSAR, is to prevent the admission of radioactive or toxic gases into the control room, thus preventing incapacitation of control room operators. The system can only perform this purpose while in the recirculating mode of operation and must maintain the specified flow rate to assure that ambient temperature conditions are maintained. Therefore, the only valid test of control room ventilation flow rate must be performed with the system in its emergency or recirculation mode of operation.

Your response to Violation 84-09-04 appears to miss the root cause of this violation, i.e., failure to adhere to procedure requirements. The discussion provided in your response presents a reasonable case for performing the leak rate determination in the manner you describe; however, procedure SP-317 does not allow this method of performance. If FPC intended to conduct the test in this manner, Technical Specification 6.8.3 provides a mean by which a temporary change to the procedure could be made. If this means had been used, a violation would not have occurred. Based upon our review of your response, NRC concludes that the violation for failure to follow SP-317 did occur.

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Within thirty days of the date of this letter, a supplemental response is requested regarding the Deviation 84-09-02, and the Violation 84-09-04. This response should address the corrective steps which will be taken to avoid a further violation or deviation and the date when full compliance will be achieved.

In accordance with 10 CFR 2.790(a), a copy of this letter and your reply will be placed in NRC's Public Document Room upon completion of our evaluation of the reply. If you wish to withhold information contained therein, please notify this office by telephone and include a written application to withhold information in your response. Such application must be consistent with the requirements of 2.790(b)(1).

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

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

Sincerely,

James P. O'Reilly  
Regional Administrator

cc: E. M. Howard, Director  
Site Nuclear Operations  
P. F. McKee, Nuclear Plant Manager  
G. R. Westafer, Manager  
Nuclear Operations Licensing  
and Fuel Management

bcc: NRC Resident Inspector  
Document Control Desk  
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and Fuel Management

bcc: NRC Resident Inspector  
Document Control Desk  
State of Florida

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