

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

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

During NRC inspections conducted on May 19 through June 15, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

- A. Technical Specification (TS) 5.6.1.1 requires written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide (RG) 1.33, Revision (Rev.) 2, Appendix A, February 1978. RG 1.33, Appendix A requires administrative procedures regarding procedure adherence. AI-500, Conduct of Operations, paragraph 4.2, Nuclear Safety Standards and Procedures, Note, states that written procedures shall be adhered to at all times except as described by AI-400E. AI-400E, Performance and Transmittal of Procedures, paragraph 1.1, Policy, states that verbatim compliance of procedures is required, but procedures must not be blindly followed.

Compliance procedure CP-150, Identifying and Processing Operability Concerns, dated May 7, 1996, paragraph 4.1.3 states in part that the discovery of degraded conditions of components, where performance is called into question, requires operability determinations. CP-150, paragraph 4.2, Phase 2: Evaluation, states in part that the Shift Supervisor On Duty (SSOD) evaluates the degraded condition for immediate disposition. If the component is important to safety the SSOD makes an immediate disposition of either Operable, Inoperable, or Complex Requiring Further Review. If the component requires further review, the SSOD is to initiate an Operability Concern Resolution (OCR). The OCR is, among other requirements, to contain the applicable Problem Report number and an immediate disposition.

Contrary to the above, on May 15, 1996, following the identification of two damaged main steam line hangers, the Shift Supervisor failed to initiate a Problem Report and an OCR as required by CP-150 until prompted by the NRC Project Manager.

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

- B. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Paragraph V.A.3 of Licensee Procedure NEP-216, Rev. 6, Plant Design Basis Documents, requires revision to plant Design Basis Documents if a modification changes a component/system function, functional requirement, or design requirement as delineated in the existing design basis document.

Paragraph V.E.1 of Procedure NEP-216 requires that: (1) the Supervisor, Nuclear Configuration Management, determine the need for a revision to plant Design Basis Documents every 12 months and that the review be documented and forwarded to records, and (2) that Design Basis Documents be formally revised every two years, as a minimum, if any outstanding Temporary Changes exist from the previous two years.

Contrary to the above, activities were not accomplished in accordance with procedures in that:

1. In August of 1993, a Temporary Change to the Makeup System Design Basis Document was not issued when a plant modification changed the Hydrogen Addition Pressure Regulator setting from 10 psig to 19.5 psig.
2. On January 29, 1996, the 12 month review of the Design Basis Documents had not been performed and documented, resulting in six Design Basis Document Temporary Changes not being incorporated into a Design Basis Document revision within the required two year time.

This is a Severity Level IV Violation (Supplement I)

- C. Crystal River TS 5.6.1.1 requires written procedures be established, implemented and maintained covering the activities recommended in Appendix A, of RG 1.33, Quality Assurance Program Requirements (Operational), Rev. 2, dated February 1978. RG 1.33, Appendix A, 1978, requires written procedures for maintenance of safety-related equipment such as steam generator tubes.

TS 5.6.2.10 requires that the inservice inspection of Once Through Steam Generator (OTSG) tubes shall be verified acceptable per the acceptance criteria of TS 5.6.2.10.4.

Contrary to the above, on February 28, 1996, the licensee approved a vendor procedure titled, Criteria To Be Applied To Eddy Current Indications By Analysis Guidelines, which provided for verifying acceptance of OTSG tubes utilizing eddy current bobbin coil voltages, and/or the linear dimension of the indication as measured by a rotating pancake coil, in lieu of the acceptance criteria provided by TS 5.6.2.10.4.

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

- D. 10 CFR 50, Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, requires that measures shall be established to assure that purchased material, equipment, and services conform to the procurement documents. These measures shall include objective evidence of quality furnished by the contractor and examination of products upon delivery.

Procedure FPC-016, Receiving Inspection of Equipment and Material, Rev. 0, dated April 24, 1972, step 4.2.2.2 requires that Quality Control Inspection personnel verify that any documentation required is present and that test results conform to the specifications.

Nuclear Procurement and Storage Manual, Section 8.4, Receiving Inspection, Rev. 12, dated June 7, 1995, step 8.4.3.2 requires that the Nuclear Materials Quality Control Inspector verify that the documentation, such as Certificate of Conformance, furnished by the vendor meets the requirements of the Florida Power Corporation purchase order. Step 8.4.3.2 also requires that test documents shall describe the type of operation and provide evidence of completion and/or verification.

Contrary to the above:

1. Six safety-related battery chargers were improperly accepted on receiving inspections in July 1972. The vendor had supplied a certificate of compliance with the licensee's purchase order; however, test data from the vendor that had been supplied with the battery chargers indicated that the battery chargers had not been tested to assure they would operate at the lowest alternating current (ac) input voltage specified in the purchase order or required by the design basis. The test data also indicated that one of the battery chargers subsequently installed in the B train failed to meet direct current (dc) output voltage regulation requirements at ac input voltages to which it was tested. The licensee's receipt inspection report, dated July 17, 1972, accepted the six battery chargers and the test data. In April, 1996, one of the two A train battery chargers was tested and similarly failed to meet dc output voltage regulation requirements. The licensee's analysis of past battery charger operability, in Licensee Event Report 96-012-01, concluded that while the battery chargers did not meet purchase specifications or the design basis, they would have been able to perform their safety function from plant licensing in December 1976 through April 1996.
2. Six safety-related battery chargers were improperly accepted on receiving inspections in November 1995. The vendor had supplied a certificate of compliance with the licensee's purchase order; however, test data from the vendor that had been supplied with the battery chargers indicated that the battery chargers had not been tested to assure they would operate at the lowest ac input voltage specified in the purchase order or required by the design basis. Two of the six battery chargers were installed in the A train in March 1996 with the plant shut down in an outage. One of the battery chargers was satisfactorily tested in April 1996 while the plant was still shut down, confirming the battery chargers' compliance with purchase specifications and the design basis.

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

- E. 10 CFR 50, Appendix B, Criterion IV, Procurement Document Control, required, in part, that measures be established to assure that requirements which are necessary to assure adequate quality are suitably included in the documents for procurement of equipment.

Nuclear Procurement and Storage Manual, Section 3.3, Amendments to Procurement Requisitions for Items, Rev. 6, dated October 31, 1991, required that Procurement Requisition Amendments be used for Purchase Order Change Orders to change procurement requirements such as item description.

Nuclear Engineering and Projects procedure 220, Specifications and Minispecifications, Rev. 5, dated November 30, 1994, required that revisions to minispecifications be prepared, verified, approved, and issued in the same manner as the original.

Contrary to the above, a letter dated April 5, 1995, from the licensee's Nuclear Engineering Design Department to the vendor, changed procurement requirements for safety-related inverters without using a Procurement Requisition Amendment. The letter directed the vendor to change inverter design specifications, including output voltage, that were in the minispecification that was incorporated into the Purchase Order. Also, the minispecification was not revised and required verification and approvals were not obtained. On about April 10, 1995, the letter was included in a revised Purchase Order without a Procurement Requisition Amendment.

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

Pursuant to the provisions of 10 CFR 2.201, Florida Power Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 12th day of July, 1996