ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River

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

The following violations were identified during an inspection conducted on March 25-29, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50 Appendix B Criterion XVI and the accepted QA program (FSAR Section 1.7.1.16, Revision 5) collectively state that measures shall be established to assure that conditions adverse to quality are promptly corrected.

   Contrary to the above, measures have not been established to clearly delineate appropriate criteria for elevating unresolved QA audit findings to higher management for resolution. Existing procedures do not provide specific conditions to guide actions in the following areas:

   a. The number of unacceptable responses to a QA audit finding and the time permitted at each step of the audit process before escalating the problem resolution to successively higher management levels in the QA organization and in the audited organization.

   b. The number of extensions to corrective action completion dates and the time permitted at each step of the audit process before the need to delay corrective action is approved by successively higher management levels in the QA organization and in the audited organization.

   c. Criteria and time permitted to resolve issues similar to those described above by which problems are presented to the Executive Vice President who is ultimately responsible for prompt and acceptable resolution of all condition adverse to quality.

   Lack of acceptance criteria of the type discussed above resulted in failure to achieve prompt corrective action on several QA audit findings.

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

2. 10 CFR 50 Appendix B Criterion V and the accepted QA program (FSAR Section 1.7.1.5, Revision 5) state that activities affecting quality shall be prescribed by procedures and accomplished in accordance with these procedures. Procedure QAP 8, Quality Program Audits, Revision 9, Section 6.6.2.1, states that if the audit team leader and the audited organization cannot reach agreement on corrective action for any finding, the audit team leader will refer these items to the Supervisor, Quality Audits. If a satisfactory resolution cannot be obtained by the Supervisor, Quality

Audits, within an additional 30 days, he initiates a nonconformance report (NCR).

Contrary to the above, the Supervisor, Quality Audits, has not initiated an NCR for audit QP 249 finding 11. The initial response to this item dated March 28, 1984, stated that the Manager, Site Services, did not agree with the QA audit finding. Additional correspondence dated November 30, 1984, from the Site Director reiterated this position and the disagreement between the QA staff and the line organization had not been resolved at the time of this inspection.

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

3. 10 CFR 50 Appendix B Criterion XVIII and the accepted QA Program (FSAR Section 1.7.1.2, Revision 5) collectively require a comprehensive system of planned and periodic audits. The frequency requirements for various audits are stated in Technical Specification (TS) 6.5.2.9 and in different sections of the accepted QA Program. Current procedures apply a variation to the stated audit and review frequency by allowing up to a 25% deviation in the stated frequency.

   Contrary to the above, the applied frequency variation is inappropriate for audits and reviews required by TS Section 6.5.2.9 and the accepted QA Program. The two-year status and adequacy review required by the accepted QA Program, Section 1.7.1.2, is scheduled for completion in April 1985 which is 30 months since the last review.

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

4. 10 CFR 50 Appendix B Criterion XVII and the accepted QA Program (FSAR Section 1.7.1.17, Revision 5) state that sufficient records shall be maintained to furnish evidence of activities affecting quality. The accepted QA program commits to Regulatory Guide 1.88, Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records, which endorses ANSI N45.2.9, Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants. Regulatory Guide 1.88 also allows record storage in accordance with NFPA-232 1975, Standard for the Protection of Records.

   Contrary to the above, record storage facilities in the Quality Programs Department do not meet ANSI N45.2.9 requirements and have not been evaluated to meet NFPA-232 1975 requirements.

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

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: MAY 17 1985