



January 4, 1993
3F0193-01

Mr. Stewart D. Ebnetter
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Atlanta, Ga 30323

Subject: Inspection Report No. 92-21
Systematic Assessment of Licensee Performance (SALP)

Dear Sir:

Florida Power Corporation (FPC) provides this letter as a response to the subject inspection report and your presentation of the report at Crystal River Unit 3 on November 20, 1992. While we are generally in agreement with the overall rating in each of the areas, our perspective on trends in some areas and on some of the specific observations differ from the report as discussed in the meeting and as reflected in the comments below. We believe that the overall posture of our nuclear organization, including management structure, programs, procedures, personnel attitude and culture, and the material condition of the plant, is improved compared to the end of the previous SALP period. Nonetheless, we recognize the need to continue to strive for improved performance and will do so including addressing the deficient areas noted in the report.

Your presentation was effective and the dialogue during the meeting was beneficial in giving us a better understanding of your views on Crystal River Unit 3 performance. We recommend that the format used in the verbal presentation (i.e., a summary of key strengths and items for improvement by SALP area) be used also in the written text of future SALP reports. Having such a summary at the beginning of each area in the report would provide a better perspective for the subsequent specific comments. Also, we recommend that the specific comments in each area be presented such that favorable comments are grouped together separately from comments that reflect deficiencies in performance.

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In addition, the meaning of a performance "trend" (i.e., declining or improving) needs to be clarified. During the meeting, it was stated that a trend, when noted, referred to performance during the SALP period (which, if continued, would likely lead to a different rating in the subsequent SALP period). However, on page three of the report, it is stated that "Plant Operations declined relative to the previous assessment period". This is a different meaning of trend. It is recommended that trend only be used in this latter context and that this meaning be explained in all SALP reports.

The following are specific comments on selected areas of the report:

Plant Operations: FPC recognizes the decline in plant operations. We have taken actions that will improve the areas that showed a decline and will further strengthen the other areas. These actions are based primarily on the assessment performed following the three reactor trips after the mid-cycle outage; however, monitoring and assessment have continued and further actions have been identified. Two of the most significant actions taken are implementation of the shift manager concept (three individuals are currently performing this role); and the placement of Operations Technical Advisors on shift rotation. The remaining two shift manager positions should be filled by mid 1993 with successful completion of SRO licensing. We will schedule further discussions with you on operations in the near future.

Radiological Controls: The "declining" trend noted for this area does not appear to be supported by the analysis provided. We have had follow-up discussions with your staff and understand the basis for the assignment of this trend. We agree that the practices of our radiation workers can be enhanced, but do not consider overall radiological controls performance to have declined. In balance, the inclusion of both a midcycle outage and a refueling outage in the same SALP period should be given due consideration relative to the noted deficiencies and their significance. Also, we believe credit should have been given in the report for our efforts and results achieved in improving fuel integrity. Efforts to create an enhanced radiation worker training program have been under way since the last refuel outage. The initial step of this program is aimed at enhancing our radiation worker's plant specific knowledge of radiological work practices. In addition, we will focus on strengthening the involvement of plant line management in establishing and implementing ALARA goals.

Maintenance/Surveillance: FPC considers the trend of performance in the maintenance area to be improving over this SALP period. In addition to the favorable comments in the report, significant progress was made in the scheduling and planning of maintenance work, work controls, and measuring maintenance effectiveness. Also, as you are aware, we made several organizational changes which included maintenance as a key area of focus

for continued improvement. We believe these changes will also contribute to improvement in the Surveillance and ISI areas.

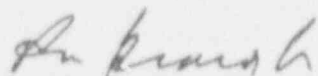
FPC does not agree that significant weaknesses in scope and in analytical technique exist in CR-3's Erosion/Corrosion (E/C) program. We consider the CR-3 approach to be comprehensive. The program utilizes V. H. Keller's empirical relationships for the purpose of developing relative rankings in large bore susceptible piping systems. Program inspections are based on these line susceptibility rankings, previous line inspection data, industry reports, engineering judgement, and plant maintenance history. In addition, numerous system improvements have been accomplished resulting in reduced wall thinning rates. These include piping material upgrades, feedwater pH increases, and amine changes (ammonia to morpholine). The culmination of all of these factors provides the basis for a strong E/C program. They also contribute toward CR-3 being considered a low susceptibility facility, thus a correspondingly low inspection base requirement, when compared to other PWRs. EPRI's working group (CHUG) concurs that all of these components are necessary for establishing an effective E/C program. FPC is closely monitoring the ongoing improvements of other analytical methods, such as the EPRI CHECMATE software, with plans to enhance the current E/C approach with supplemental analysis when the validation effort for this research grade software is complete.

Safety Assessment/Quality Verification: We believe the trend in performance in this area was improving over the SALP period and as reflected in the comments in the report. Weaknesses in the Problem Report process, surveillance procedures and licensing submittals appear to have been given more weight than warranted. FPC made enhancements to the Problem Report process during this SALP period but recognizes that further improvement is needed. Activities have begun to address the identified issues. With regard to quality and thoroughness of NRC submittals, FPC does not consider it unusual or indicative of a lack of thoroughness when questions arise on submittals. Many submittals address highly technical issues where increased amounts of written information do not necessarily ensure there will not be further questions. We do not believe the first and third examples of submittals noted in the report are indicative of a lack of thoroughness and the second example was inappropriate since the referenced submittal did not occur during this SALP period. However, we will continue to strive to provide a sound basis for all the items we request the NRC to review and plan to keep requests for supplemental information to a minimum.

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In conclusion, we appreciate the opportunity to share our views on the SALP report and the SALP process. FPC places a high priority on maintaining and strengthening the communications established with all levels of the NRC. We look forward to future meetings with NRC Region and Headquarters management and consider these meetings an essential element in the overall success of our nuclear program.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

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