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**Florida
Power**
CORPORATION

June 6, 1985
3F0685-07

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 84-33, Supplemental Response

Dear Sir:

Florida Power Corporation provides the attached as our supplemental response to the subject inspection report. This response has been delayed as described in our letter dated May 31, 1985.

Sincerely,

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

RMB/feb

Attachment

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FLORIDA POWER CORPORATION
SUPPLEMENTAL RESPONSE
INSPECTION REPORT 84-33

VIOLATION 84-33-01

Technical Specification (TS) 3.7.13.5 requires the oxygen concentration in any waste gas decay tank (WGDT) to be less than 2% by volume whenever the concentration of hydrogen in that WGDT is greater than or equal to 4% by volume.

Action statement b for this TS requires whenever both the concentration of hydrogen and oxygen are each greater than or equal to 4% by volume in a WGDT, that waste gas additions to this tank be suspended and that the oxygen concentration be reduced to within its limit.

Contrary to the above, during the period from 3:30 a.m. on December 13, 1984, through 8:25 a.m. on December 14, 1984, WGDT's B, C, and A exceeded the 4% hydrogen and oxygen limits and waste gas additions to these tanks were not suspended.

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

SUPPLEMENTAL NRC POSITION

Our review of your response to Violation 84-33-01 has reaffirmed our position that the violation did occur. In your response, you stated that following the implementation of the new Radiological Effluent Technical Specifications (TS) on July 1, 1984, you realized that you would not be able to comply with the actions of TS 3.7.13.5.b for the waste gas decay tanks (WGDTs) using the normal system configuration of the waste gas system. You further stated that a telephone conversation was held between FPC and NRC on July 10, 1984, in which a resolution of this conflict was obtained. This resolution, which was discussed with an NRC licensing reviewer, was that adding dilution nitrogen required some admission of waste gas into the WGDTs since nitrogen could only be added via the waste gas header.

We have discussed this telephone conversation with the reviewer involved, Mr. Charles Willis. Mr. Willis stated that his position was based upon the understanding that the waste gas header was going to be isolated from everything except the affected WGDT during the nitrogen addition process and that the small amount of waste gas that was added during the nitrogen addition process was only that waste gas present in the header at the start of the process. This understanding is strengthened by a statement in your telecon/meeting summary dated July 10, 1984, which stated: "This method of nitrogen addition also introduces the small amount of waste gas which is in the header to the WGDT."

Mr. Willis stated that he was unaware that your actual intention was to leave the waste gas header on line, thus allowing the continued admission of waste gas to the decay tank. As a result, during the period of December 13-14, 1984, when attempts were being made to reduce the oxygen concentration in the tanks by adding nitrogen through the waste gas header, your activities did not reduce the oxygen concentration but, instead, caused a continuing increase in both hydrogen and oxygen concentrations. This increase resulted in a situation that continued to exceed the TS limits for permissible gas concentrations.

SUPPLEMENTAL RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation (FPC) concurs with the stated violation that waste gas was added to Waste Gas Decay Tanks B, C, and A while the 4% hydrogen and oxygen limits were exceeded.

(2) Designation of Apparent Cause:

The teleconference referenced in our original response between FPC and NRC/NRR/ETSB and documented to NRC/NRR/ETSB, NRC/IE/RII and the Senior Resident Inspector was interpreted by FPC to allow the dilution of the waste gas decay tanks by introduction of nitrogen through the waste gas header. This does result in the waste gas being swept into the waste gas decay tank being diluted.

(3) Corrective Action:

Procedure OP-412, "Waste Gas Disposal System" will be revised to incorporate methodology to dilute the waste gas decay tanks with nitrogen without the addition waste gas.

This will be accomplished by the connection of a temporary nitrogen source to an instrument tap of the affected tank. The out of service waste gas decay tank will be isolated and direct addition of nitrogen can be accomplished.

(4) Corrective Action to Prevent Recurrence:

The corrective action described above is sufficient to preclude recurrence.

(5) Date of Full Compliance:

Full compliance will be achieved on or before June 20, 1985.