



**Florida  
Power**  
CORPORATION

Crystal River Unit 3  
Docket No. 50-302

January 20, 1993  
3F0193-07

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Reference: NRC letter to FPC dated December 11, 1992  
Notice of Violation - Inspection Report 92-27

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the subject inspection report. Also included as Attachment 2 within this response is our reply to your request for additional information.

Please note that an extension of this response to January 20, 1993 was agreed to by K. D. Landis, Nuclear Regulatory Commission, in conference with E. E. Froats (FPC) prior to the Christmas holidays. The extension was confirmed with A. R. Long, Region II staff, on December 30, 1992.

Sincerely,

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

EEF:mag

Enclosure

xc: Regional Administrator, Region II  
NRR Project Manager  
Senior Resident Inspector

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FLORIDA POWER CORPORATION  
NRC INSPECTION REPORT NO. 50-302/92-27  
REPLY TO NOTICE OF VIOLATION

VIOLATION 50-302/92-27-01

Technical Specification (TS) section 6.8.1 requires that written procedures shall be established, implemented, and maintained covering Surveillance and test activities of safety related equipment. Step 4.7.1 of Surveillance Procedure SP-340B, "DHP-1A, BSP-1A, and Valve Surveillance," revision 23, stated "Establish flow at 1500 gpm (with allowable oscillation averaged value between 1470 and 1530 gpm), by throttling BSV-28."

Contrary to the above, on October 12, 1992, a licensed operator failed to properly implement step 4.7.1 and throttled flow by opening valve BSV-3, the motor operated spray header isolation valve, which resulted in delivering spray flow to the Reactor Building.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The reason for the Violation is considered to be personnel error in failure to apply proper self-checking measures to ensure adequate comprehension and correct implementation of required procedural guidance. Human Engineering deficiencies in the procedural guidance and insufficient training in operator self-checking/cross-checking methods are considered to have also contributed to this Violation.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The operator involved in the incident has been counselled by appropriate line management. Operations administrative guidance has been enhanced to ensure appropriate activities are reviewed for the necessity of a pre-job briefing. Consideration for additional implementing personnel and for direct supervision of critical activities has been included in the Pre-job Briefing Checklist.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Applicable procedural guidance will be improved by providing additional barriers to preclude incorrect valve manipulation (such as appropriate CAUTION or NOTE statements prior to adjusting flow or prior to starting pump). Designation of primary operator and locations of appropriate components will be clarified.

Additionally, operator training will be enhanced to include current industry self-checking and cross-checking methods and techniques.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The appropriate procedures will be improved by January 30, 1993 and the enhanced training will be provided to the operating staff by June 30, 1993.

VIOLATION 50-302/92-27-02

Technical Specification 3.8.1.1 requires that two separate and independent diesel generators be operable. With one diesel generator inoperable, action b. requires that the operability of the remaining AC sources be demonstrated by verifying correct breaker alignment and indicated power availability within one hour.

Contrary to the above, on October 27, 1992, the "B" diesel generator was inoperable for approximately two hours during the performance of Surveillance Procedure SP-907B, "Monthly Functional Test of 4160 ES Bus B Undervoltage Relays", but the required breaker alignment and indicated power availability verifications were not performed.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the Violation.

REASON FOR THE VIOLATION

The reason for the violation is considered to be personnel error with inadequate procedural guidance as a contributing factor.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

A Short-Term Instruction (STI) was issued to operating personnel referencing the failure to enter the action statement. The STI stated in part "...whenever Tech Spec equipment is disabled for the purposes of performing a non Tech Spec required surveillance, the appropriate action statement must be entered for the equipment and remedial surveillances must be performed".

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FUTURE VIOLATIONS

SP-907A and SP-907B have been revised to require operations personnel to declare the associated diesel INOPERABLE and enter the appropriate Technical Specification Action Statement.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The referenced Surveillance Procedures were revised on November 23, 1992 (SP-907B) and December 15, 1992 (SP-907A).

FLORIDA POWER CORPORATION  
NRC INSPECTION REPORT NO. 50-302/92-27  
REPLY TO REQUEST FOR ADDITIONAL INFORMATION

The cover letter for Inspection Report 50-302/92-27 requests additional information concerning FPC's plans regarding compliance with TS action statements during surveillances which are required by the TS. The following discussion is provided in response to that request.

The NRC, in Generic Letter (GL) 91-18, communicated to licensees two chapters of the Inspection Manual that deal with operability assessments and several related topics. The positions contained in the guidance, including the requirement to enter ACTION statements during the performance of TS required surveillance activities, were expressly recognized to potentially raise backfitting issues for certain licensees. FPC is one of those licensees.

FPC requests that this issue be deferred until after implementation of the CR-3 Improved Technical Specifications (ITS) later this year. At that time, FPC is willing to voluntarily change its practice to require entry except where the TS specifically acknowledge the impracticality of doing so. The reason for suggesting this course of action is that the existing surveillance procedures are not written to facilitate determining which portions render specific TS controlled structures, systems, and components inoperable. While this could be accomplished, the methodology for accomplishing many surveillances would need to be changed to accommodate the arbitrary time limits imposed by current STS based TS. These same procedures will be undergoing significant revisions as part of ITS implementation and, thus, would need to be significantly changed twice over a very short period of time. Doing so is inconsistent with high quality procedure content. Further, many Allowed Outage Times (AOT) have been expressly modified to accommodate this new NRC position in the generic ITS development process and others will be appropriately modified in the ongoing lead plant efforts.

Should the NRC choose to impose this new position on FPC at this time we respectfully suggest that the provisions of 10 CFR 50.109 be appropriately considered as indicated in GL 91-18. The NRC has certainly been aware of our position and practice for a sufficient period of time to constitute tacit approval. Imposing the NRC staff position now instead of later this year would have an adverse impact on safety for the reasons outlined above.

FPC believes we have communicated a consistent position on this matter to the NRC in a variety of forums over a number of years. We strongly suggested to senior NRC staff management that this issue should be generically deferred until after the implementation of TSIP. NRC staff management decided to issue the guidance and deal with problems on a case-by-case basis. FPC continues to believe that the course of action chosen by NRC staff management (publication of GL 91-18 with the full knowledge that many of the positions constituted backfits for a large number of licensees) was an inefficient use of NRC and licensee resources. We have contributed to the Nuclear Management and Resources Council, Inc. (NUMARC) comments to that effect and are generating plant specific comments as requested by the NRC after the workshop on GL 91-18 held in Region I. We would also request that the NRC defer imposition of any GL 91-18 backfits until these comments can be appropriately dispositioned.