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**Florida  
Power**  
CORPORATION

September 17, 1985  
3F0930-11

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. 85-15  
Revised Response

Dear Sir:

Florida Power Corporation provides the attached as our supplemental response to the subject inspection report.

Sincerely,

W. S. Wilgus  
Vice President  
Nuclear Operations

AEF/feb

Attachment

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PDR ADOCK 05000302  
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**FLORIDA POWER CORPORATION  
SUPPLEMENTAL RESPONSE  
INSPECTION REPORT 85-15**

**VIOLATION 85-15-01**

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).

**RESPONSE**

(1) Florida Power Corporation Position

FPC has evaluated the staff's response to our June 14, 1985 denial of this proposed violation and continues to believe that this violation is not warranted. You state in your August 28, 1985 letter to FPC: "We acknowledge that there are no NRC escalation guidelines and that the specific guidelines stated as part of the cited violation are not formal regulatory requirements." We agree with your conclusion that no regulatory requirement has been violated.

The inspector stated "lack of acceptance criteria of the type discussed above resulted in failure to achieve prompt corrective action on several QA audit findings." The finding of specific items of alleged non-compliance does not, however, demonstrate a non-compliance in the program for controlling those activities. FPC's June 14, 1983 response to the Notice of Violation specifically

addressed each of the points cited by the inspector and demonstrated how FPC's program meets the requirements of 10 CFR 50, Appendix B, Criterion XVI.

At the time of the I&E Inspection, the program for elevating unresolved QA audit findings was delineated in QAP-18 "Control of Nonconformance Reports" and QAP-8 "Quality Program Audits". Since the time of your inspection, several enhancements to our program for elevating unresolved QA audit findings have been instituted. These include a memorandum issued by the Vice President, Nuclear Operations clarifying finding extension and escalation. In addition QAP-8, "Quality Program Audits", has been revised to further clarify the process relative to granting corrective action extensions and escalation guidelines. These enhancements will further strengthen our corrective action program relative to QA audit findings.

It is requested that this violation be withdrawn and that the NRC evaluate the effectiveness of our enhanced program as an Inspector Follow-up Item.