

Official

MAY 03 1985

Florida Power Corporation  
ATTN: Mr. Walter S. Wilgus  
Vice President Nuclear Operations  
P. O. Box 14042, M.A.C. H-2  
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: REPORT NO. 50-302/84-33

Thank you for your response of March 1, 1985, to our Notice of Violation issued on January 31, 1985, concerning activities conducted under NRC Operating License No. DPR-72.

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.

The situation described above illustrates the need to develop written and complete requests for TS resolutions, except in those infrequent instances where expeditious resolution is required due to operational necessity. Your comment concerning the omission of the words "begin to" in the Notice of Violation is noted. However, this omission is not significant since it does not change the intent of the TS.

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Within thirty days of the date of this letter, a supplemental response is requested regarding Violation 84-33-01. This response should address the corrective steps which will be taken to avoid a further violation or deviation and the date when full compliance will be achieved.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.


Should you have any questions concerning this letter, please contact us.


Sincerely,


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J. Nelson Grace  
Regional Administrator

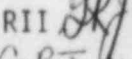
cc: E. M. Howard, Director  
Site Nuclear Operations  
P. F. McKee, Nuclear Plant Manager  
G. R. Westafer, Manager  
Nuclear Operations Licensing  
and Fuel Management


bcc: NRC Resident Inspector  
Document Control Desk  
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
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