

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

July 3, 1997
3F0797-17

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Response to Request for Additional Information, Notice of Violation
and Exercise of Enforcement Discretion (NRC Special Inspection Report
No. 50-302/97-04), NRC Letter 3F0697-08 to FPC dated June 6, 1997

Gentlemen:

The purpose of this letter is to provide a response to an NRC request for additional information. By letter dated April 11, 1997, NRC issued Special Inspection Report No. 50-302/97-04. That inspection report identified three apparent violations and one weakness involving the untimely reporting of events or conditions. By letter dated May 15, 1997, Florida Power Corporation (FPC) provided a response to the apparent violations.

By letter dated June 6, 1997, NRC acknowledged receipt of FPC's May 15, 1997, response and requested that additional information be provided. Specifically, the NRC required a response addressing how FPC will ensure that extent of condition reviews and other actions are sufficient to ensure adequacy of the reporting program.

FPC acknowledges the importance of extent of condition reviews and the importance of prompt and accurate reporting. Additional actions have been implemented since FPC's May 15, 1997 response. Compliance Procedure CP-111, "Processing of Precursor Cards (PCs) for Corrective Action Program," Revision 57, became effective on June 6, 1997. That revision incorporated a requirement for the Root Cause Team to perform "Extent of Condition" determinations.

9707100036 970703
PDR ADOCK 05000302
P PDR



U.S. Nuclear Regulatory Commission

3F0797-17

Page 2

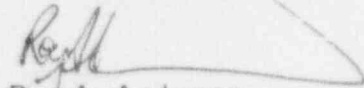
CP-111 requires precursor cards, determined to be reportable under either 10CFR50.72 or 10CFR50.73, be graded as Level 'A' or 'B', and thereby receive a root cause evaluation. The root cause evaluation includes determining and addressing the extent of condition identified during the evaluation. This requirement is an improvement in the process for ensuring that extent of condition analyses are part of the root cause evaluation process.

CP-111 also requires that a representative from Regulatory Affairs [Nuclear Regulatory Assurance Group (NRAG)] be a member of the Precursor Card Screening Committee (PCSC). The PCSC reviews each precursor card. This review follows the Nuclear Shift Manager's review. Membership to the PCSC ensures that NRAG also reviews each precursor card for potential reportability. Additionally, CP-151, "External Reporting Requirements," Revision 1, effective June 25, 1997, requires that the Manager, Nuclear Regulatory Assurance Group (or alternate) participate in the PCSC meetings for review of precursor cards for [potential] reportability.

Approximately 600 old precursor cards and problem reports have been reviewed for potential reanalysis. This review resulted in the identification of four potentially reportable items. One item had been reported as a Licensee Event Report. The other three items have been determined to be not reportable. These reviews, along with the design basis reviews, have resulted in 17 reportable items which were identified through the FPC reporting process. These results provide FPC with confidence that reportable items are being identified and the process improvements in CP-111 and CP-151 will ensure continued appropriate identification of reportable items.

FPC shares the NRC's expectations regarding the importance of extent of condition evaluations and the importance of prompt and accurate reporting. The above actions will ensure that extent of condition reviews are performed not only for precursor cards identified as being reportable under 10CFR50.72 or 10CFR50.73, but for any condition deemed significant enough to warrant a root cause analysis.

Sincerely,



Roy A. Anderson
Senior Vice President
Nuclear Operations

RAA/dwh

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