

Florida Power

CORPORATION
Crystal River Unit 3
DocCat No. 50-302

July 1, 1997
3F0797-42

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

Subject: Response to a Notice of Violation (NRC Inspection Report No. 50-302/97-01), FPC to NRC letter, 3F0697-14, dated June 16, 1997

Gentlemen:

In the subject letter, Florida Power Corporation (FPC) provided a supplemental response to a Notice of Violation (50-302/97-01-04) concerning untimely calibration of Spent Fuel Pool level transmitters. FPC has discovered inaccuracies in our supplemental response to that Violation. FPC's June 16, 1997 supplemental response stated:

"The View/Print Working Copy program has been revised. A cover sheet is now printed with working copies of SPs which require the SP TAG STATUS report to be run. The initial date that the report is run is included. This cover sheet is transmitted with the completed SP."

"AI-400E will be revised by June 15, 1997, to reflect the above change to the View/Print Working Copy Program concerning MACS SP TAG STATUS."

These statements were based on a preliminary corrective action plan and were not properly validated. The revisions to the View/Print Working Copy program and AI-400E were actually completed on June 27, 1997. FPC regrets the error.

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In a related matter, an NRC inspection of the CR-3 maintenance program conducted the week of June 16, 1997, identified a concern with untimely calibration of Fire Service pressure switches. The concern was similar to the calibration problem with the Spent Fuel Pool level transmitters noted in Violation 50-302/97-01-04. The Fire Service Pressure switches were initially scheduled for calibration in 1990 under the Preventive Maintenance Program. In 1993, they were inappropriately transferred to corrective maintenance work requests and were not calibrated until 1997.

FPC has concluded the corrective actions for Violation 97-01-04 adequately address this additional problem. Administrative Procedure AI-605, Preventive Maintenance Program, has been revised effective June 30, 1997, to give specific guidance for actions required when instruments exceed their calibration interval. This guidance includes:

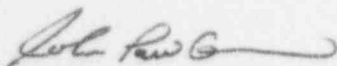
A Precursor Card will be generated prior to the activity becoming overdue to document the condition and provide corrective actions to prevent recurrence;

An evaluation will be performed for overdue Preventive Maintenance activities to determine their impact on equipment operability, plant operation or other plant programs; and,

If additional work requests are required to perform the Preventive Maintenance activity, they will maintain the same work class and due dates as the original activity and will be tracked to completion.

An Extent of Condition review of corrective maintenance work requests for out of calibration instruments was conducted and revealed five additional instruments that had exceeded their calibration interval. None of these instruments are used in Surveillance Procedures. In each case, an inappropriately classified work request had been generated to complete the activity. The revision to AI-605 noted above will also prevent these problems from recurring. Other classes of Instrument and Control work requests are being reviewed to determine if similar problems exist. This review will be completed by July 11, 1997.

Sincerely,



John Paul Cowan
Vice President, Nuclear Production

Attachments

JPC/RLM

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

ATTACHMENT 1

The following table contains a listing of commitments contained in this response:

Response Section	Commitment	Due Date
Page 2	Other classes of Instrument and Control work requests are being reviewed to determine if other problems exist.	July 11, 1997