Florida Power
CORPORATION

January 7, 1988
3F0188-06

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License DPR-72
Inspection Report 87-34

Dear Sir:

Florida Power Corporation (FPC) provides the attached response to NRC Inspection Report 87-34.

As discussed with the Resident Inspector, FPC's extensive investigation revealed information that was not previously known at the time of the apparent violation concerning the upper and lower ring settings. It also became apparent that the information given to the Inspector concerning the inoperability of the fans was based on inoperability at a different time than the time frame of the cited violation.

Should there be any questions, please contact this office.

Sincerely,

E C Simpson

E. C. Simpson, Director
Nuclear Operations Site Support

WLR:mag

Att.

xc: Dr. J. Nelson Grace
Regional Administrator, Region II

Mr. T. F. Stetka
Senior Resident Inspector

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Action Taken to Prevent Recurrence

1. The responsible Project Manager was retrained on the requirements of CP-118 and his responsibilities associated with making sure personnel working his projects were aware of procedural requirements.

   In addition, an Interoffice Memorandum was issued to all personnel reminding them of their responsibilities regarding fire watch duties.

Violation 87-34-01

B. TS 3.9.12 requires that the auxiliary building ventilation exhaust fans be operating whenever one pair of exhaust fans are inoperable and fuel is being moved within the storage pool.

   Contrary to the above, on November 11, 1987, during the period of 9:55 p.m. to 10:04 p.m., one pair of exhaust fans were inoperable and the other pair of exhaust fans were secured while fuel was being moved in the storage pool.

   This is a Severity Level IV Violation (Supplement I).

NRC VIOLATION RESPONSE 87-34-01

Florida Power Corporation denies that a violation of Technical Specification 3.9.12 occurred. The basis for this denial is provided below.

Technical Specification 3.9.12 states:

"The auxiliary building ventilation exhaust system servicing the storage pool area shall be OPERABLE."

OPERABLE is a Technical Specification term as defined below:

"A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment, that are required for the system, subsystem, train component or device to perform its function(s), are also capable of performing their related support function(s)."

On November 19, 1987, AHF-14A and AHF-14C were secured for only 9 minutes to reduce the negative pressure in the Auxiliary Building which was interfering with a maintenance activity, not associated with fan operability.

Florida Power Corporation contends that voluntarily turning the fan off for reasons not related to the operability of the fans does not necessitate entry into the action statement since both of the ventilation trains were still operable. In addition, the short duration of the shutting down of the fans assured that operator cognizance of the status of the Spent Fuel Building Ventilation was maintained. This constitutes adequate controls to assure the ventilation system would have been turned on if needed based on area radiation alarms or notification of the Control Room by the Spent Fuel Area work crew.

FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 87-34

VIOLATION 87-34-02

A. TS 6.8.1.a requires the implementation of written procedures for those activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix "A", Section I recommends both general and specific procedures for performing maintenance.

Compliance procedure CP-118, Fire Prevention Work Permit Procedure, requires, in part, in Step 4.2.2 that the fire watch will verify that all combustibles have been protected, that floor and wall openings have been protected, and that a fire watch be assigned to watch for sparks in floor areas below where the work is taking place.

Maintenance Procedure MP-109, OTSG Relief Valve Maintenance requires the upper ring settings of the relief valves to be set at +165 (+170 for valves MSV-40 and MSV-48) and the lower ring settings of the relief valves to be set at -6.

Contrary to the above:

1. On October 25, 1987, at approximately 1:15 PM, procedure CP-118 was not implemented in that combustibles were not protected, floor and wall openings were not protected, and a fire watch was not assigned to watch for sparks in lower floor areas. As the result of this implementation failure, welding activities on the 119 foot elevation in the reactor building caused sparks which fell through a floor opening and resulted in a fire in unprotected combustibles on the 95 foot elevation of the building.

2. On November 2, 1987, it was determined that procedure MP-109 was not implemented in that the upper and lower ring settings were set in the range of +142 to +174 and -3 to -12, respectively on 14 of the 16 relief valves.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

Florida Power Corporation's Position

Florida Power Corporation (FPC) accepts example one of the violation, however, denies example two. FPC does not agree that MP-109 was implemented incorrectly. An extensive review of the circumstances surrounding this event was conducted in response to the apparent violation. Florida Power Corporation disagrees that the condition is a violation that necessarily resulted from nonadherence to procedures. Based on discussions with engineering and maintenance personnel knowledgeable of valve design and refurbishment, FPC believes that the ring settings were set in accordance with the procedures in effect at the time. A disparity between the as found data and the documented set of data does not conclusively indicate a violation of adherence to procedures because the as found data methodology may be unreliable for that degree of accuracy.

FPC believes the disparity is due to ring slippage during disassembly. The current methodology is sensitive to the configuration of the component and its handling during disassembly subsequent to locking pin removal. The locking pin assures that the ring settings are maintained during operation after the rings are set in place. Movement during component removal (with the locking pin removed) could have caused the slight variances identified. The procedure in effect did not preclude removal of the locking pin between setting and checking the as found condition. FPC used "match marks" during the recent valve refurbishment as an additional method to maintain proper settings until the locking pin was installed. The adjustments were also witnessed by the valve manufacturer representative. FPC understands the importance of positive ring setting controls and the impact on overall valve performance and operability and will take the following actions:

1. Applicable maintenance procedures (MP-109) will be revised to provide a positive means of ring setting verification.

2. Maintenance personnel will review changes to procedures following the procedure revision and/or prior to the next maintenance activity conducted on the valves.

Apparent Cause of Violation (Example 1)

1. The cause of the violation was personnel error.

Corrective Action

1. The fire watch involved was immediately instructed on proper placement and responsibilities of a fire watch. The floor and wall openings were protected and an additional fire watch was assigned to the area below the welding activity.

Date of Full Compliance

1. Full compliance was achieved on October 25, 1987.