

NOTICE OF VIOLATION

Florida Power Corporation  
Crystal River Unit 3

Docket No. 50-302  
License No. DPR-72

During NRC inspections conducted on May 4 through June 7, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

- A. Technical Specification 5.6.1.1 requires that written procedures shall be established, implemented, and maintained covering the applicable activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Appendix A, paragraph 1.d, includes administrative procedures for procedural adherence.

Licensee Compliance Procedure CP-111, Processing of Precursor Cards for Corrective Action Program, Revision 56, specified the time allowed for preparing the apparent cause summary and the corrective actions for a Grade "C" precursor card (PC). Steps 4.6 and 4.11 of the procedure provided for extensions to the time, as long as a record of the extension request was included in the file for the PC. Step 3.2.5.1 of Procedure CP-111 stated that the Apparent Cause Evaluator (ACE) must be qualified, which included receiving apparent cause training and performing ACE functions at least yearly thereafter. Step 4.3.2.1.4 of Procedure CP-111 stated that the Precursor Card Screening Committee (PCSC) designate a qualified Root Cause Team (RCT) Leader for Grade "B" PCs. Step 4.3.2.1.1 of Procedure CP-111 stated that the PCSC is to grade each PC in accordance with Enclosure 3, PC Grading Guidance, of CP-111.

Contrary to the above, on May 9, 1997, the inspectors identified the following examples where Procedure CP-111 was not followed:

- The extensions for five of fifteen Grade "C" PCs reviewed (97-0039, 0046, 0697, 0786 and 0867) were in violation of the procedural requirements in that the 20-days (total time) specified in CP-111 was exceeded and there was no record of any extension requests in the applicable PC file.
- Individuals performing the ACE function for nine of the fifteen Grade "C" PCs were not qualified in that they had not received the apparent cause training. Also, for three of these nine PCs, neither the ACE nor the approving Responsible PC Manager had received the apparent cause training. Also, the inspectors identified one case where the RCT Leader for a Grade "B" PC (97-0052) was not fully qualified to perform the function of a RCT

Leader in that the individual had not received all the specified training.

- For a number of the Grade "D" PCs examined (which included but was not limited to PCs 97-0624, 97-1540, 97-1671 and 97-1871), the guidance listed in Enclosure 3 of CP-111 indicated that the PCs should have been graded as a "C" in that these PCs met some portion of the guidance for grade "C" PCs.

This is a Severity Level IV violation (Supplement 1).

- B. 10 CFR 50, Appendix B, Criterion IX, Control of Special Processes, requires, in part, that measures shall be established to assure that processes such as nondestructive testing are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Contrary to the above, on May 7, 1997, the licensee failed to control and accomplish adequately planned nondestructive hydrostatic testing of the emergency feedwater system per Modification Approval Record (MAR) 96-10-02-01 and Maintenance Procedure (MP) 137, System Hydrostatic Pressure Testing, Revision 28, in that a briefing of Operations was neither required nor routinely expected; the addendum to clearance Engineering Change Order (ECO) 97-04-026 issued for the test did not incorporate requirements for protecting adjacent systems; the completed Maintenance Procedure 137, Enclosure 3, System Test Requirements, did not incorporate requirements for protecting adjacent systems; engineering personnel were not involved with the planned performance of the test; and the maintenance crew performing the test procedure did not recognize or understand the requirements for protecting adjacent systems.

This is a Severity Level IV Violation (Supplement 1).

- C. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, and deviations are promptly identified and corrected.

Contrary to the above, in the following three examples, the licensee failed to correct conditions adverse to quality promptly and adequately:

1. On April 17, 1997, the security staff failed to understand adequately and develop guidance properly to address the multiple temporary losses of power to the central alarm station computers and intelligent multiplexer;
2. In December 1995, engineering failed to consider the extent of condition for the failure of a secondary alarm station uninterruptible power supply unit that was removed because of swollen batteries due to old age;

3. Prior to and after the December 1995 failure of a secondary alarm station uninterruptible power supply unit, the licensee failed to establish a preventive maintenance program to assure all security uninterruptible power supply units would be maintained in a manner commensurate with their importance to maintaining security equipment in proper functioning order.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Florida Power Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, at the Crystal River facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia  
this 7th day of July 1997