

**Florida
Power**
CORPORATION
Crystal River Unit 3
Docket No. 50-302

December 6, 1996
3F1296-07

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

Subject: Supplemental Response to NRC Integrated Inspection Report 96-11

Reference: A. NRC to FPC letter, 3N1096-30, dated October 30, 1996
B. FPC to NRC letter, 3F1196-06, dated November 27, 1996

NRC Integrated Inspection Report (IR) 50-302/96-11 (Reference A) commented on several areas of weakness in addition to several notices of violations. The purpose of this letter is to inform you of our efforts to address the weaknesses and to briefly give a status of planned improvements. A response to the violations contained in IR 96-11 has already been sent under a separate letter (Reference B).

The Inspection Report identified several areas of concern regarding the work in and around the Reactor Building Sump. FPC understands the importance of the sump in ensuring ECCS operability and subsequent core safety. This concern led to inspections of the sump area and debris screens. FPC personnel identified that original construction of the screens was not in accordance with design drawings. FPC management immediately decided to extend the schedule of the existing short maintenance outage, to ensure the screens were fully capable of their intended function with adequate margin for worst case accidents. Work in the sump commenced and, partly due to the location and conditions of the work, coordination of the work was not up to management standards. In our haste to correct the deficiencies, project management was not properly set up and personnel running the job were not versed on all aspects of the work controls necessary for this work. This caused some confusion in coordinating the QC inspections and equipment clearances such that delays and other problems resulted. The Crystal River Unit 3 sump is now in compliance with design drawings. A third party review of the design, both as found and as left, identified no operability problems. Human performance aspects of the work have been discussed with project managers and other personnel with emphasis given to oversight in the early stages of complex work situations to prevent similar problems in the future.

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Another weakness identified was the result of implementation deficiencies of the new Quality Control (QC) program for the Chemistry Department. The chemistry laboratory uses both a computerized database program and instrumentation logbook for quality control logging. The existing computer database has limited comment storage space for logging out-of-tolerance actions. This is compounded by the fact that not all of the Technicians in the lab are familiar with techniques to expand the comment field. The computer database used for quality control is being replaced this month. The new application will include many enhancements including corrective actions for the above identified problems. Interim guidance was issued to the lab staff to use instrument logbooks if additional documentation of quality control activities is needed. This information was not, however, provided in the form of a procedure change and was overlooked by some personnel. FPC recognizes this method of disseminating information was not effective, therefore, the Quality Control Manual will be changed during the next revision to include guidance on the minimum documentation associated with out-of-tolerance quality control checks.

In the area of Quality Assurance, a generic weakness related to the effectiveness of the Corrective Action Process was noted. Specifically, while issues identified in problem reports were being corrected, precursor cards did not appear to be an effective Corrective Actions Process. As we discussed during our meeting in Atlanta on November 14, 1996, a new Corrective Action Process was approved and implemented the week of November 18, 1996. The new process, employing proven problem identity techniques and described in Compliance Procedure (CP) 111, consists of graded precursor cards vice problem reports (which received a root cause analysis) and precursor cards (which received no root cause analysis). The majority of precursor cards under the new single graded approach will either receive a root cause analysis (Grade A & B) or an apparent cause analysis (Grade C). While less than 10% of all precursors will be Grade A or B, approximately 80% will be Grade C, enabling cause analysis to be performed on some 90% of all corrective action documents. This process will not only be more effective in determining root causes for significant events, it will also, through a common cause analysis process, involving tracking and trending of apparent causes, be more effective in preventing more significant events through corrective action taken as a result of cause analysis of less significant events.

Finally, a weakness related to implementation of sampling requirements in the Offsite Dose Calculation Manual (ODCM) was noted. Chemistry personnel interpreted sampling frequency requirements beyond that expressed in the ODCM. The interpretation of sample requirements of the standby Decay Heat Closed Cycle Cooling system as daily only if the system was operating, was not in strict accordance with the daily requirement listed in the ODCM. This interpretation, made in the early 1990's, does not meet the present management expectation of both procedure compliance and program implementation of regulatory requirements. The ODCM was revised on August 14, 1996, to provide clarification on the sampling requirements of the associated systems. The Event-Free Operations program and Management Corrective Action Plan Phase II both emphasize the expectation of procedure compliance and regulatory compliance. Although this weakness was specifically in the chemistry area, these programs apply to the entire organization.

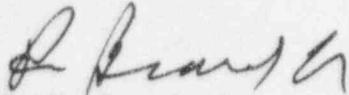
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We appreciate the identification of areas needing improvement in the NRC inspection reports. We will continue to address each weakness noted through our corrective action program and keep you informed of our results.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB/GHH

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