



**Florida
Power**
CORPORATION

August 8, 1988
3F0888-05

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License DFR-72
Inspection Report 88-16

Dear Sir:

Florida Power Corporation provides the attached response to
NRC Inspection Report 88-16.

Should there be any questions, please contact this office.

Very truly yours,

Rolf C. Widell
Director, Nuclear Operations Site Support

WIR:mag

Att.

xc: Regional Administrator, Region II
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 88-16
REPLY TO NOTICE OF VIOLATION

VIOLATION 88-16-01

- A. Technical Specification (TS) 4.6.4.1 requires that a channel calibration, which includes a check of the channel alarm functions, be performed on the containment hydrogen analyzers.

Contrary to the above, as of June 8, 1988, a channel calibration that included a check of the channel alarm functions has not been performed since this instrumentation was initially installed in August 1983.

This is a Severity Level V violation (Supplement I).

RESPONSE

FLORIDA POWER CORPORATION POSITION

Florida Power Corporation (FPC) disagrees with the above violation for the following reasons:

Technical Specification 3/4.6.4.1 is the Technical Specification that Crystal River Unit 3 was originally licensed with. CR-3 originally had no permanently installed hydrogen monitoring equipment; therefore, this Technical Specification has been and is still being satisfied using portable equipment. The portable equipment has no remote alarm function. The operability of the portable equipment is demonstrated by SP-713, GOW-MAC Quarterly Surveillance Program and SP-714, Gas Analyzer Quarterly Surveillance Program.

NUREG 0737 required the facility to install permanent containment hydrogen monitors. This was done under MAR 79-11-70-11. Florida Power submitted Technical Specification Change Request No. 82, dated March 31, 1983, for these two monitors. This Change Request is not yet approved. However, anticipating that the request would be approved and to assure the operability of the new monitors, Florida Power Corporation wrote and implemented two surveillance procedures, titled as follows, to meet this requirement:

SP-160A - Functional and Operability Check of the Containment Hydrogen Monitor WS-10-CE.

SP-160B - Functional and Operability Check of the Containment Hydrogen Monitor WS-11-CE.

Florida Power Corporation acknowledges that SP-160A and SP-160B inadvertently reference TS 3/4.6.4.1 in Section 1.2 titled, "Technical Specifications/Other References".

Florida Power Corporation will revise SP-160A and SP-160B by September 30, 1988 to correct the Technical Specification reference and to include the check of all alarm functions.

VIOLATION 88-16-02

- B. 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 J recommends written laboratory instructions to prescribe the nature of sampling and analysis.

Chemistry Procedure CH-101, "Determination of Boron, Mannitol Complex Titration Method", Step 9.2.1 and Table 1, requires that a 25 milliliter volume of sample be aliquoted for analysis.

Contrary to the above, on June 1, 1988, Procedure CH-101 was not implemented in that a 10 milliliter volume of sample was aliquoted for analysis.

This is a Severity Level V violation (Supplement I).

RESPONSE

FLORIDA POWER CORPORATION POSITION

FPC accepts the violation with the clarification that the accuracy of the analysis was not compromised.

Apparent Cause of Violation

The guidance given in CH-101 was intended to be a guideline but was not stated as such. The supervisor made a technical decision allowing the use of the smaller sample because he considered the sample volumes listed in Table I to be guidelines.

Corrective Actions

CH-101 has been changed to be less restrictive and to clarify that the recommended volumes are guidelines. The supervisor was made aware that directing the chemist to perform work outside the existing approved procedures, without making the proper changes to the procedure, is beyond his authority.

Date of Full Compliance

Full compliance was achieved upon issuance of the revised CH-101 on June 15, 1988.

Actions Taken to Prevent Recurrence

The above corrective actions should be sufficient to prevent recurrence.

VIOLATION 88-16-05

- C. 10 CFR Part 50, Appendix B, Criterion XVI, requires corrective action measures that assure that nonconformances are promptly identified and corrected and that such measures prevent repetition of these nonconformances.

Section 1.7.1.16 of Florida Power Corporation'S (FPC) Quality Program requires nonconformances to be promptly identified and corrected, and that the corrective action taken be sufficient to prevent repetition of the nonconformances.

In a letter to the NRC from FPC dated November 18, 1987 in response to and providing corrective actions for the violation identified in NRC Inspection Report 50-302/87-30, the licensee stated that correct chart paper associated with the liquid radioactive release flowrate recorder would be ordered and used.

Contrary to the above, as of May 14, 1988, FPC has failed to take prompt corrective action to obtain and use the correct chart paper. This failure contributed to the recurrence of the violation identified in Inspection Report 50-302/87-30.

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

RESPONSE

FLORIDA POWER CORPORATION POSITION

Florida Power Corporation (FPC) accepts the violation.

Apparent Cause of Violation

An apparent lack of communication between the department receiving the chart paper and the department requesting the chart paper caused the time delay in obtaining and installing the chart paper. The department receiving the inquiries about the chart paper was apparently misinterpreting the request to apply to a similar but unrelated item and was, therefore, telling the inquirer the item was on backorder.

Corrective Action

The correct chart paper was obtained and installed in the recorder. The individuals involved were made aware of the need for better, more specific communication.

Date of Full Compliance

Full compliance was achieved on May 16, 1988 upon installation of correct chart paper.

Action Taken To Prevent Recurrence

The above actions should be sufficient to prevent recurrence.