



**Florida
Power**
CORPORATION

August 29, 1988
3F0888-17

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 88-09
Revised Response

Dear Sir:

Attached please find Florida Power Corporation's (FPC) revised response to Inspection Report 88-09. The original response to IFI 88-09-06 was incorrect. A more complete description of the table-top review and procedure walk-throughs is provided by this revision along with several editorial corrections. The only changes are on the first three pages; therefore, the thirty-three page (33) attachment is not enclosed.

Should you have any questions, please contact this office.

Very truly yours,

Rolf C. Widell
Director, Nuclear Operations Site Support

WLR:mag

Att.

xc: Regional Administrator, Region II
Senior Resident Inspector

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 88-09

IFI 88-09-01

Placekeeping deficiencies were identified during control room walk-throughs of the EOPs. Operators typically use loose sheets of paper or their fingers as placekeeping aids. Additionally, when questioned on the problem of placekeeping, the operators indicated that they would remove the individual procedures from the notebooks and place them on the desk. This is undesirable, particularly when one considers that the EOPs are not stapled and can easily become intermixed, separated, or lost. This is an indication of a placekeeping deficiency. The licensee has committed to resolve these placekeeping deficiencies.

FLORIDA POWER CORPORATION (FPC) ACTION

FPC has placed permanent book marks in the Control Room Emergency Operating Procedure (EOPs). FPC has also increased the number of EOP sets in the Control Room to three.

IFI 88-09-02

Currently, the licensee has no document in place to cross reference operator action points for plant parameters to where they occur in procedures. The licensee has committed to implement an EOP cross reference document.

FPC ACTION

FPC agrees an EOP cross reference document would be beneficial and commits to implement the EOP cross reference by June 30, 1989.

IFI 88-09-03

Correction of technical discrepancies contained in EOPs as outlined in Appendix B of Inspection Report 88-09.

FPC ACTION

Reference Appendix B response for line-for-line item comments. These procedural changes will be implemented by October 31, 1988, unless otherwise stated. This provides time for verification on the simulator.

IFI 88-09-04

Correction of human factors discrepancies contained in EOPs as outlined in Appendix C of Inspection Report 88-16.

FPC ACTION

Reference Appendix C response for line-for-line item comments. These procedural changes will be implemented by October 31, 1988, unless otherwise stated.

IFI 88-09-05

Correction of labeling discrepancies between EOPs and panel indications as outlined in Appendix D of Inspection Report 88-09.

FPC ACTION

FPC agrees that components should be uniquely labeled and delineation made in the EOPs should be such to avoid any ambiguity. For this reason Unique Equipment Identification Numbers (Tag Numbers) are assigned to all equipment. These Tag Numbers used in the EOPs should agree with the Equipment Labeling used in the plant. To ensure this goal is met FPC utilized Quality Program personnel to perform a comparison of all EOPs against control board labeling.

The nomenclature discrepancy performed by the inspection team in many cases compared the short functional description used in the EOPs against the control board labeling. A review of these discrepancies was performed item by item and the response is detailed in Appendix D.

IFI 88-09-06

Licensee needs to re-perform EOP table top review and procedure walk-throughs to upgrade the V&V program.

FPC ACTION

Procedures revised as a result of the inspection received a table top review. The procedures were walked thru in the field by two licensed operators not involved in the writing or revising of the procedures.

The procedures receive a minimum of 60 hours review per year per license holder at the Power Safety Simulator. This review is in the form of accident simulation. This review is performed by Shift personnel, Licensed Administrative Staff, and Training Department personnel. Problems encountered by these personnel are forwarded to the Operations Engineer for resolution which may include procedure revision.

The normal training cycle also provides input for procedure improvement. Licensed operators as a minimum are required to review all Emergency Operating Procedures on an annual basis. Discrepancies noted are forwarded to the Operations Engineer for resolution.

As evidenced by the above response, the end user of the procedures reviews the Emergency Operating Procedures numerous times throughout the year. Recommendations for improvement are encouraged. Administrative procedures are in place to provide the operator with a mechanism to ensure his concerns are addressed and that feedback on his suggestions received.

Florida Power Corporation believes these mechanisms provide strong usable procedures and a sense of ownership to the persons that ultimately have to use the procedures.

IFI 88-09-07

Licensee will review SOTA training and upgrade if necessary.

FPC ACTION

The training of all SOTAs has been reviewed, by the Nuclear Operations Training Department and the Nuclear Safety Supervisor, and found to be adequate. In order to respond to the specific concerns discussed in the Inspection Report, all SOTAs were given a walk-through, on the use of VP-540, Runback Verification Procedure, and VP-580, Plant Safety Verification Procedure, by a qualified Senior Reactor Operator. These walk-throughs were completed satisfactorily and documented. The SOTA Requalification program provides further assurance that the level of training of all SOTAs is adequate. As of July 29, 1988, each qualified SOTA has spent 30 hours on the B&W simulator in Lynchburg, Virginia.

Each qualified SOTA also will spend or has spent 120 hours in classroom requalification training during the periods of May 16 through June 3 or August 1 through August 19, 1988. Successful completion of these requalification programs will provide conclusive evidence of the adequacy of the training of all SOTAs.

IFI 88-09-08

Licensee needs to formalize the program for ongoing evaluation of EOPs.

FPC RESPONSE

AI-402, Writers Guide for Abnormal, Verification and Emergency Operating Procedure does provide an on-going EOP evaluation process. This, in conjunction with the operator annual EOP review and the biannual simulator reviews, is FPC's formal on-going EOP evaluation.

IFI 88-09-09

Re-validation of the EOPs when the plant specific simulator is operational.

FPC RESPONSE

FPC will re-evaluate its EOPs on its plant specific simulator within one year from the date the simulator becomes fully operational.