

**Florida
Power**
CORPORATION

September 22, 1988
3F0988-15

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 88-18
Revised Response

Dear Sir:

Florida Power Corporation (FPC) provides the following to correct two errors contained in the following paragraphs of letter number 3F0988-10 dated September 16, 1988. The underlined words have been changed/inserted.

- 1) The one-hour reporting requirement is the time frame for accomplishment of the report. At FPC/Crystal River 3, making the actual report is the responsibility of the Nuclear Shift Supervisor on Duty (NSSOD). Until this key management position is notified, the "clock" does not begin. The process for identifying nonconformances and determining that design basis or other reporting obligations are involved must be timely, but no explicit regulatory mandate is contained in 10 CFR 50.72 or elsewhere. The FPC position is consistent with guidance given in the new LER rule workshops, a subsequent national meeting sponsored by NUS and attended by the Staff, and in various informal interrogatories.
- 2) The definition of "design basis" is not sufficiently clear. The implicit implication of a one-hour reporting requirement and the explicit examples given in NUREG-1022 imply a more narrow definition. FPC suggests that "design basis" be much more clearly defined. In the interim, FPC will continue to report rather liberally, i.e., we are reporting many events we suspect were not intended to be reported. We believe that a more clear definition and more uniform industry implementation would have many benefits. The definition should, in our opinion, be related to those structures, systems, and components relied upon to mitigate design basis events and should implicitly or explicitly include some aspect of significance.

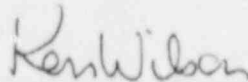
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Should there be any questions, please contact this office.

Yours very truly,



Kenneth R. Wilson
Manager, Nuclear Licensing

WLR:mag

xc: Regional Administrator, Region II
Senior Resident Inspector