

**Florida  
Power**  
CORPORATION

October 18, 1988  
3F1088-12

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

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
NUREG 0737, Supplement 1  
Detailed Control Room Design Review (DCRDR)

Dear Sir:

Florida Power Corporation (FPC) is submitting this letter to address the four (4) outstanding survey Human Engineering Observations (HEO's) identified in NRC - SER letter dated August 29, 1988. The status and schedule of these concerns was discussed in brief with Mr. Harley Silver on August 23, 1988. This letter should adequately address the concerns and permit closure of the SER.

NRC Concern #1

Bailey meters on the Engineered Safeguards panels have extremely small multipliers (e.g., x 100) and engineering units (e.g., PSIG) which are difficult to read. An HEO was written by the licensee for this problem on another panel. Because the review team identified the same problem on a different panel, a concern arose as to whether this problem was evident throughout the control room. The licensee committed to re-evaluating these meters on all panels. (NUREG-0700 Guideline 6.5.1.3a)

FPC Response #1

FPC had generated HEO 385 to document this finding. Even though the character height is slightly smaller than the guideline suggests (3/32" vs 1/8"), they are still readable at distances double the normal viewing distance (>2ft). Additionally the slightly shorter height provides a good height contrast between the scale graduation characters and the multiplier characters.

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A review of the task analysis worksheets support the fact the operators had no trouble reading the proper indications during emergency operations. Therefore, no further actions are required.

#### NRC Concern #2

The Startup Feedwater valve open-close switch and test button on the Engineered Safeguards panel is not near the Emergency Feedwater System. The licensee indicated that at the time of the control room survey they were functional and in use; however, the test button is no longer used as a result of the recent Emergency Feedwater control modifications, and is being removed. The licensee did not indicate, however, what would be done with the valve switch. The licensee has committed to evaluate the location of the startup feedwater valve switch and to either remove the switch or relocate it on the Emergency Feedwater panel. (NUREG-0700 Guidelines 6.4.1.1.b(.2), 6.4.2.2b, 6.8.2.1c)

#### FPC Response #2

FPC has documented and taken action on HEO 387 by removing the test pushbuttons for FWV-14, FWV-15, FWV-29 and FWV-30 during Refuel VI. The open/auto position selector switches for FWV-39 and FWV-40 have been determined to be no longer required by a study performed for SPIP recommendation TR-071-MFW. These open/auto position selector switches are scheduled to be removed from the main control board in Refuel VII which is scheduled to begin in Fall 1989.

#### NRC Concern #3

BSV-3 and DHV-110 scales (SPEC 200 Foxboro controllers) on Engineered Safeguards panels are difficult to read due to small scale markings and the black pointer tip underneath a clear scale. The licensee committed to assess this discrepancy. (NUREG-0700 Guideline 6.5.2.2a)

#### FPC Response #3

FPC has generated HEO 386 to document this finding.

Further review has determined that the discrepancy with the SPEC 200 Foxboro controller pointers is due to both the local setpoint pointer and the scale markings both being black in color.

This problem exists only on the controllers for BSV-3 and BSV-4 since they are the only two controllers with dual scales. The problem is minimized somewhat due to both scales being identical and the fact that the local setpoint indicator only masks the right hand scale.

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The local setpoint pointer will be painted a different color to provide contrast with the overlying scale markings prior to restart from Refuel VII. The scale marking size (3/32") is consistent with the normal viewing distance (2 ft) when operating these controllers.

NRC Concern #4

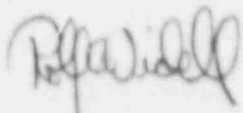
There are single filament bulb indicator lights in the control room that have no test capability. The licensee committed to re-survey the control room to identify and assess any safety-related lights that are normally off and have no other means of telling that they are burned out. (NUREG-0700 Guideline 6.5.3.1a)

FPC Response #4

This item was previously documented on HEO 247. FPC has performed a re-review of all indicating lights on the main control board which are normally off. Eight safety-related indicating lights with single filaments were found. Although, these lights have no test capability and are normally off, there is annunciation for these functions on the control board. Therefore, no additional modifications are required.

Should there be any questions, please contact this office.

Sincerely,



Rolf C. Widell, Director  
Nuclear Operations Site Support

RCW/EMG/sdr

xc: Regional Administrator, Region II  
Senior Resident Inspector