Florida Power
CORPORATION

October 19, 1988
3F1088-14

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 88-24

Dear Sir:

Florida Power Corporation provides the attached response to NRC Violation 88-24.

Should there be 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
INSPECTION REPORT 88-24
REPLY TO NOTICE OF VIOLATION

VIOLATION 88-24-02

10 CFR Part 21.21 requires that each corporation adopt appropriate procedures to provide for evaluating deviations, and assure that a director or responsible officer is informed if a basic component supplied: fails to comply with the Atomic Energy Act of 1954 or any applicable rule, regulation, or license of the Commission relating to a substantial safety hazard; or contains a defect.

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action", requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material, equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.

Contrary to the above, it was discovered that:

1. The licensee failed to perform an adequate evaluation of two Limitorque Technical 10 CFR Part 21 reports to determine the applicability to its installed hardware and effect on the plant design bases, specifically: (a) an August 13, 1985 Limitorque potential worm gear failure due to certain speeds and operational mode; and (b) an August 8, 1986 Babcock & Wilcox preliminary safety concern letter regarding Limitorque valve actuator weight discrepancies (302/88-24-02); and,

2. The licensee has failed to adopt appropriate procedures to ensure that vendor technical deviations are adequately and fully evaluated in a timely manner as evidenced by the following examples:

   (a) August 13, 1985 - Limitorque letter in regard to worm gear failures- Evaluation incomplete and is still open as a Request for Engineering Information (REI) 85-10-06;

   (b) August 8, 1986 - B&W letter in regard to Limitorque valve weight problems - Evaluation incomplete and is still open as REI 86-09-09;

   (c) February 23, 1987 - Sorrento Electronics letter in regard to post-LOCA High Range Radiation Monitor detector cable problems- inadequate evaluation; and

   (d) February 10, 1988 - Power Conversion letter recommending 100 amp fuse replacement with 225 amp fuse - Evaluation started on 5/3/88 does not address design change issue and is still open.

This is a Severity Level IV violation (Supplement 1).

RESPONSE

Florida Power Corporation (FPC) accepts the violation.

APPARENT CAUSE OF VIOLATION

There are two primary causes for the violation: 1) Lack of understanding of reporting requirements by the technical staff; and 2) the procedures implementing the vendor technical process did not include a time frame to resolve the vendor information.

CORRECTIVE ACTION

The Limitorque letter dated August 13, 1985 has been evaluated for safety significance. The initial review indicated the concern was applicable to two valves at Crystal River Unit 3 (CR-3). Based on the design function of the valves, the way the system is operated, the way post maintenance testing is performed on the operators, and the regular surveillances performed, it was determined that this issue is not a significant safety concern at CR-3.

The Babcock & Wilcox preliminary safety concern dealing with the discrepancy in Limitorque actuator weights (PSC 4-85) has been evaluated for safety significance. Based on the evaluation of the increased weight effects for nine cases and the results of similar evaluations done at other B&W plants, it was determined that this issue is not a significant safety concern at CR-3.

As stated in the Inspection Report, the Sorrento Electronics letter has been closed.

The handling of the February 10, 1988 Power Conversion letter was assessed by Site Nuclear Engineering Services and Nuclear Engineering Assurance Management. The purpose of the assessment was to determine whether appropriate review and priority was placed on the resolution of this issue. Since the letter is based primarily on problems with equipment at CR-3 and the technical staff is very familiar with the issues raised and the status of the CR-3 equipment, the need did not exist for immediate action. It was decided that the recommended breaker change was not immediately required since the CR-3 equipment was not experiencing the problem and a full technical evaluation of the recommended change would be handled as a routine activity. The technical evaluation was completed on September 29, 1988. Florida Power Corporation's assessment of this issue has concluded that, for the circumstances, the timing to evaluate this information was appropriate and the technical evaluation was adequate.

A task group composed of key managers from Engineering, Licensing, Quality Programs, and the Plant Staff was established to investigate the problems in the Vendor Technical Information Program and to coordinate efforts to resolve the issue. This group was chaired by the Director, Nuclear Operations Site Support and has been meeting regularly since the inspection.

Nuclear Operations Department Procedure NOD-17, Design Basis Issue Resolution, was issued. This procedure contains information relative to vendor technical information as potential input into the process for the resolution of design basis issues including consideration of reporting requirements.

A Quality Programs Department Surveillance titled: "Vendor Technical Information Program Evaluation" has been performed. The purpose of this evaluation was to identify the requirements and commitments for the program and to review how they are being satisfied. The draft of this surveillance has been reviewed with the task group.

An interoffice memo was issued to Engineering personnel to remind them of their responsibilities relating to the vendor technical program and to review their open items and assure the items are being tracked for timely resolution.

DATE OF FULL COMPLIANCE

An adequate evaluation was performed on items (a) and (b) on August 12, 1988.

The Technical Evaluation of the February 10, 1988 Power Conversion letter was completed on September 29, 1988.

NOD-17 was issued on August 15, 1988.

The interoffice memo was issued October 19, 1988.

ACTION TAKEN TO PREVENT RECURRENCE

Florida Power Corporation has initiated a review of all closed Vendor Technical Information packages for correct determination of applicability to CR-3; missed reporting under 10 CFR 21 or other requirement; and to assure any follow-up actions were completed. This review will be complete by January 31, 1989.

The results of the Quality Programs surveillance and its review form the basis for a restructuring of the program. Included in this effort will be an update of Nuclear Operations Department Procedure NOD-06, Technical Information Program, to provide a more comprehensive overview of the program and departmental interfaces. This will be revised by January 31, 1989.

A revision will be made to AI-404, Review of Technical Information, to enhance FPC's program to ensure a timely review and disposition of identified vendor technical deviations. This will be revised by January 31, 1989.

The understanding of reporting requirements by the technical staff has previously been addressed as the result of several other separate issues. FPC has made considerable effort to enhance the awareness and sensitivity to design basis issues and associated reporting requirements. These efforts, along with changes to procedures adding prompts for consideration of reporting requirements, should resolve this issue.