

ENCLOSURE

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

Docket No. 50-302
License No. DPR-72

During the Nuclear Regulatory Commission (NRC) inspection conducted on September 16 - October 21, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. Technical Specifications (TS) 6.8.1.a requires that procedures established as recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, be adequate for the cause.

Regulatory Guide 1.33, Appendix "A", Section I.3, recommends the establishment of procedures for the repair or replacement of equipment.

Maintenance procedure MP-101, Removal and Replacement of Reactor Coolant System RTDs and Thermowells, was written to meet the requirements of Regulatory Guide 1.33 and specifies in section 8 the post maintenance testing required after RTD and thermowell replacement.

Contrary to the above, on October 20, 1988, procedure MP-101 was found to be inadequate in that this procedure did not require that a system leak test be conducted at normal operating pressure following the replacement of a thermowell in the reactor coolant system.

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

- B. TS 3.8.2.3 states:

The following D.C. bus trains shall be energized and operable: Train "B" consisting of 250/125 volt D.C. bus No. 3B, 250/125 volt D.C. battery bank No. 3B, and two 50% capacity chargers. Applicability Modes 1, 2, 3, and 4.

Action: b. With one 250/125 volt D.C. battery and/or a charger inoperable, restore the inoperable battery and/or charger to operable status within 2 hours or be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

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Contrary to the above, from 0753 on September 17, 1988 until 0323 September 18, 1988, Crystal River Unit 3 was operated in Mode 1 with "B" battery charger in the "B" train inoperable and the "F" (swing) charger paralleled with the "D" charger. This alignment was equivalent to only one operable 50% capacity battery charger in the "B" train. The action statement for TS 3.8.2.3 was not entered. The misalignment of the "B" train battery chargers occurred when clearance 88-09-71 was issued and improperly executed. The misalignment was not recognized until the clearance was restored.

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

- C. TS 6.8.1.c states that written procedures shall be established, implemented and maintained covering surveillance and test activities of safety related equipment.

Contrary to the above, on October 14, 1988, with the plant in the cold shutdown condition, procedure SP-132, Engineered Safeguards Channel Calibration, was not properly implemented in that a second channel calibration was started prior to completion of the previous channel. This action resulted in an inadvertent actuation of the Engineered Safeguards System.

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

Pursuant to the provisions of 10 CFR 2.201, Florida Power Corporation is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Crystal River, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) admission or denial of the alleged violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION



Bruce A. Wilson, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Dated at Atlanta, Georgia
this 24th day of November 1988