



**Florida
Power**
CORPORATION

June 2, 1988
3F0688-01

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 88-11

Dear Sir:

Florida Power Corporation provides the attached response to
NRC Inspection Report 88-11.

Should there be any questions, please contact this office.

Very truly yours,

Rolf C. Widell
Director, Nuclear Operations Site Support

WLR:mag

Att.

xc: Dr. J. Nelson Grace
Regional Administrator, Region II

Mr. T. F. Stetka
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 88-11
REPLY TO NOTICE OF VIOLATION

VIOLATION 88-11-01

Technical Specification 4.4.4.2 requires that the emergency power supply for the pressurizer heaters shall be demonstrated operable every 18 months by manually transferring power from the normal to the emergency power source and energizing the heaters.

Contrary to the above, on March 24, 1988, it was determined that the emergency power supply for the operable set of pressurizer heaters had never been periodically tested to ensure operability by manually transferring power from the normal to the emergency power source and energizing the heaters.

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

RESPONSE

Florida Power Corporation (FPC) accepts the violation.

Apparent Cause of Violation

The cause of the violation was a deficient surveillance procedure. Surveillance Procedure SP-417, Refueling Interval Integrated Plant Response to Engineered Safeguards Actuation, satisfies Technical Specification Surveillance Requirement 4.4.4.2 by aligning 126 kw of pressurizer heater units to the emergency power source (126 kw of Pressurizer Heater capacity is a requirement to have an operable pressurizer). SP-417 energizes the 126 kw of pressurizer heaters through Pressurizer Heater MCC 3B. When the Pressurizer Heater MCC 3B current-limiting reactor failed, the tested Pressurizer Heater MCC was removed from service. The fact that Pressurizer Heater MCC 3A had not been tested by SP-417 during the last refueling outage was unknown by the Operations personnel and the action statement for Limiting Condition for Operation (LCO) 3.4.4 was not entered. No formal mechanism was in place for the operators to differentiate which Pressurizer Heater (MCC 3A or MCC 3B) had been tested. Reviews of SP-417 prior to March 24, 1988 had determined that Surveillance Requirement 4.4.4.2 was being satisfied by surveillance of MCC 3B, but overlooked the fact that SP-417 did not take advantage of the redundancy in the design of the pressurizer heater system and also test MCC 3A.

Corrective Action

After the Nuclear Shift Supervisor on Duty (NSSOD) was informed of the situation by the NRC Resident Inspector at 1815 hours March 24, 1988, the NSSOD immediately entered the action statement of LCO 3.4.4. Operations personnel also reviewed applicable plant procedures and proceeded to demonstrate the operability of the emergency power supply for Pressurizer Heater MCC 3A. The NSSOD exited the action statement of LCO 3.4.4 at 1843 hours.

Date of Full Compliance

Full compliance was achieved at 1843 hours March 24, 1988.

Actions Taken to Prevent Recurrence

FPC will review its procedures and implement the necessary actions to periodically demonstrate the operability of the emergency power supply to Pressurizer Heater MCC 3A.