

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

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

During an NRC inspection conducted on October 6 through 24, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, Corrective Actions, requires that conditions adverse to quality such as malfunctions and deficiencies be promptly identified and corrected.

Contrary to the above, conditions adverse to quality were not promptly corrected, in that:

1. Work request Numbers 333797 and 333798, issued in March 1996 to install stem protectors on the actuators for Makeup valves (MUV)-58 and MUV-73 were closed without performing the work. As of October 8, 1997, the stem protectors had not been installed on these valve actuators.
2. As of October 24, 1997, design engineers failed to take action to correct design drawing errors for Drawings 206-058, Revision 18, and 206-075, Revision 19. As a consequence, incorrect information was used as inputs in several electrical calculations. The licensee's design engineers became aware of the discrepancies on the drawings during development of Revision 3 to emergency diesel generator (EDG) Calculations E-91-0026 and E-91-0027; however, Precursor Cards or Drawing Change Notices were not initiated to have the drawing deficiencies corrected until this issue was identified during the inspection.

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

- B. 10 CFR 50, Appendix B, Criterion XI, Test Control, requires that a test program shall be established to assure that all testing required to demonstrate structures, systems, and components will perform satisfactory in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

The Final Safety Analysis Report (FSAR) Section 6.1.2.1.1, High Pressure Injection (HPI) states that "The four HPI valves (MUV-23, 24, 25, and 26) may be supplied by either of the two channels of the ES electrical buses through operation of selector switches in the control room."

Enclosure 1

FSAR Section 6.1.3.1.1, "RCS Cold Leg Small Break LOCA," Table 6-14, "ECCS Single Failure Analysis for RCS Cold Leg Small Break LOCA," and Table 6-19, "ECCS Single Failure Analysis for HPI Injection Line Small Break LOCA", describe required operator action during a SBLOCA coincident with a LOOP and a failure of one of the ES trains to swap the electrical power supply for 2 injection valves from the normal to the alternate energized source and opening the valves so that adequate HPI flow can be provided to mitigate the event.

Enhanced Design Basis Document (EDBD) For The Makeup And Purification System, Revision 8, dated August 8, 1997, Section 3.0, Component Parameters, states in part that "MUV-23, MUV-24, MUV-25, MUV-26 must each have redundant power supplies."

Contrary to the above, as of October 10, 1997, the licensee did not establish a test program and procedures to verify that the HPI Valves MUV-23, 24, 25, and 26 could be powered from both the normal and emergency power sources. Specifically, HPI valves were tested per SP-457 and SP-457A. These procedures stroke time the HPI injection valves once from their normal power supply. This testing did not verify that the valves could be powered from the alternate power source and that all control circuitry operates properly.

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

- C. 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, activities affecting quality documented in Procedure SP-195, "Remote Reactor Vessel Level Instrument Calibration", were not of a type appropriate to the circumstances in that SP-195 directed the technician to readjust the reduced inventory reactor vessel level transmitters following completion of the calibration section of SP-195, which left the instruments in a condition of no longer being calibrated and not meeting the acceptance criteria in SP-195.

This is a Severity Level IV Violation (Supplement I)

- D. 10 CFR 50 Appendix B, Criterion XII, Control of Measuring and Test Equipment, as implemented by the licensee's Quality Assurance Program, Final Safety Analysis Report, Revision 23, Section 1.7.1.12.5, Control of Measuring and Test Equipment, requires an investigation to be conducted and documented to determine the validity and acceptability of previous usage of measuring and test equipment found to be out of calibration.

Contrary to the above, installed measuring and test equipment Gages MU-22-PI and MU-27-FI, used for In-service Test Program surveillance, were found out of calibration on February 15, 1996, and no investigation of previous usage was conducted or documented.

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

- E. 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Foreign Material Exclusion (FME) Control procedure, CP-116A, Section 4.0 provides the instructions for establishing an FME area. Section 4.1.1 directs the principle work group supervisor to refer to Enclosure 1, FME Logic, as needed to determine if an FME area is required. Enclosure 1 noted that if tools/materials can fit through the opening, then establish an FME area with controls as required per this procedure. Section 3.3.2 provides guidance for installing temporary closures for FME areas.

Contrary to the above, activities affecting quality were not accomplished in accordance with the documented instructions in that the principle work group supervisor failed to establish an FME area with controls, as required by CP-116A, when covers were removed from the "B" containment building spray pump motor, which provided an opening that would allow tools/materials to fit into the motor enclosure.

This is a Severity Level IV Violation (Supplement I)

- F. 10 CFR 50, Appendix B, Criterion III requires that applicable regulatory requirements and design basis are correctly translated into drawings, procedures and instructions.

Contrary to the above, as of October 24, 1997, the design bases were not correctly translated into drawings, procedures and instructions in that the thermal overload relays for safety related ECCS HPI valves MUV-23 and MUV-24 were set for manual reset instead of automatic reset as stated in the FSAR, Section 6.1.2.4.

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

- G. 10 CFR 50, Appendix B, Criterion XVI requires, in part, that measures shall be established to assure that conditions adverse to quality 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.

Contrary to the above, as of October 24, 1997, the configuration of Decay Heat Valves DHV-34 and DHV-35 were being maintained in the closed position during normal operation without an adequate safety evaluation to support this configuration. Significant design weaknesses were being addressed by the licensee based on past problems and enforcement in this area; however, this NRC identified specific problem had not been identified by the licensee as part of past corrective actions.

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 U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Crystal River Unit 3 facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 4th day of December 1997