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**Florida
Power**
CORPORATION

July 31, 1986
3F0786-05

Dr. J. Nelson Grace
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 86-04
Revised Response

Dear Sir:

Florida Power Corporation provides the attached as our revised response to the subject inspection report.

Sincerely,

R. C. Widell
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Attachment

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FLORIDA POWER CORPORATION
REVISED RESPONSE
INSPECTION REPORT 86-04

VIOLATION 86-04-03

Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Appendix "A" of Regulatory Guide 1.33, November 1972 recommended procedures for combating emergencies and other significant events including reactor trip.

Contrary to the above, three examples were noted where the licensee failed to properly implement required procedures in the performance of abnormal procedure AP-580, Reactor Protection System Actuation, following the reactor trip on January 1, 1986, specifically:

- a. The operators failed to depress the reactor trip push button as specified by Immediate Action 1 of AP-580.
- b. The operators performed only Remedial Action 3, open MUV-24, of the four actions specified by Immediate Action 6 of AP-580.
- c. The operators did not open the suction from the Borated Water Storage Tank to the running makeup pump(s) as specified by the Detailed Action to be performed under Follow-up Action 2 of AP-580 when Make-up Tank level is less than or equal to 55 inches.

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

RESPONSE

1. Florida Power Corporation's Position

- a. Florida Power Corporation (FPC) agrees with this example of the stated violation in that the operators failed to depress the reactor trip push button as specified by Immediate Action 1 of AP-580.
- b. FPC agrees the operators performed only Remedial Action 3 of the four actions specified by Immediate Action 6 of AP-580. However, FPC does not consider this to be an example of a violation since the actions taken were consistent with Florida Power Corporation philosophy, training, and the Plant Operating Quality Assurance Manual. The abnormal procedures are guidance procedures written to address a wide variation in levels of severity. The procedures are written to assure the plant will be stabilized in a worst case event. Operators have been trained to use judgement when taking remedial actions based on the status of the plant. All remedial actions may not be required for each event. The operators took appropriate action for this event by opening MUV-24. The operator was aware that since the pressurizer level was decreasing slowly and the event was proceeding as expected, no drastic action was needed.

- c. FPC agrees that the operators did not open the suction from the Borated Water Storage Tank to the running make-up pump(s) as described in Follow-up Action 3 of AP-580. FPC disagrees that this is an example of a violation since the actions taken were consistent with Florida Power Corporation philosophy, operator training, and the Plant Operating Quality Assurance Manual. Follow-up Actions are performed after immediate and remedial actions are complete. The Follow-up Actions are guidance provided to maintain plant stability once it is achieved. The desired result is for the operators to maintain the stability of the plant and to assure critical parameters are satisfied for proceeding to the next major activity. Since the Abnormal Procedures cover a range of circumstances, the procedures give details for the action steps that will achieve the particular result for that step. The method detailed may not be the best response considering the plant status at any given time. The operators are trained to understand this, and they are trained to use judgement to assure that for the given conditions, the most appropriate action is taken. In this case, the use of the Reactor Coolant Bleed Tank to raise the Make-up Tank level per the normal approved operating procedure was the most appropriate action since this is the preferred normal method and the operator had the time to assure the RCBT parameters were proper.

2. Apparent Cause

Failure to depress the "Reactor Trip" push button was an oversight by the operator. The operator had observed parameters which indicated the reactor was already tripped.

3. Corrective Actions

No corrective action is considered necessary.

4. Actions Taken to Prevent Recurrence

The incident is considered to be an isolated occurrence. All operations personnel are trained annually on the requirement to perform all immediate actions of abnormal procedures. All operators have been retrained subsequent to this event.

Proposed violations b. and c. are apparently the result of an interpretation of the FPC Administrative Procedures (AI's) that is different from the FPC interpretation. Administrative Procedure AI-400 will be revised by September 1, 1986 to clarify that the Abnormal Procedures are guidance procedures, and operators are to use their judgement and discretion when performing remedial and follow-up actions to assure the most appropriate method of obtaining the desired condition is implemented, based on the severity of the event and status of the plant.

5. Date of Full Compliance

Full compliance was achieved on January 1, 1986.