



**Florida  
Power**  
CORPORATION

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September 26, 1986  
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Dr. J. Nelson Grace  
Regional Administrator, Region II  
Office of Inspection and Enforcement  
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. 86-21

Dear Sir:

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

In Part 7 of the subject report, the NRC again asserts that NUREG-0737, Item 1.A.2.3 requires that Certified Instructors participate in total licensed operator requalification training. We recognize this as the NRC interpretation; however, FPC continues to disagree, as indicated by our earlier correspondence on the subject.

Sincerely,

Rolf Widell  
Manager, Nuclear Operations  
Licensing and Fuel Management

AEF/feb

Attachment

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**FLORIDA POWER CORPORATION  
RESPONSE  
INSPECTION REPORT 86-21**

**VIOLATION 86-21-01**

10CFR50, Appendix B, Criterion V states that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Training Department Procedure TDP-203, Licensed Operator Requalification Training Program, Revision 3, required that in the event of any unsatisfactory simulator performance as evaluated by simulator instructors during simulator training, training and operations management must evaluate the licensee's overall performance and determine whether or not the person should be removed from licensed duties until an accelerated requalification program is completed. If the licensee is not removed from licensed duties, a written justification approved by the operations manager must be maintained.

Contrary to the above, it was noted that during the period of time this requirement was in effect, nine individuals received an overall unsatisfactory simulator performance rating on one of three drill evaluations and that actions required under this condition by procedure TDP-203, Revision 3, were not satisfactorily implemented.

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

**RESPONSE**

**Florida Power Corporation's Position**

Florida Power Corporation (FPC) acknowledges the NRC position that actions required by TDP-203, Revision 3, were not implemented in accordance with an NRC interpretation of TDP-203 which is different from that intended when the procedure was written. The situation was aggravated by the inconsistent use of the word "overall" by FPC and the simulator contractor. The contractor used "overall" in reference to unsatisfactory performance on one of three drill evaluations. The use of the word "overall" in TDP-203, Revision 3, Section 6.1.2.2, including the requirement for management review of licensee performance, was intended to apply only to unsatisfactory performance on the complete simulator training evaluation.

When FPC received notification from the simulator contractor in January 1986, that nine individuals (four Senior Reactor Operators (SRO's), three Reactor Operators (RO's), one Shift Operations Technical Adviser (SOTA), and one instructor) received unsatisfactory grades on one of the three scenarios evaluated, the Manager, Nuclear Operations Training immediately directed the Nuclear Licensed Operator Training Supervisor to contact the simulator contractor to determine the extent of the remedial training and corrective actions that had been taken.

The resulting telephone conversation revealed the nine individuals who failed the one scenario received remedial training "on the spot" at the simulator and were not considered by the simulator vendor to be overall unsatisfactory when the training was completed. This was reaffirmed by the Nuclear Licensed Operator Training Supervisor to the Manager, Nuclear Operations Training and the Manager, Nuclear Plant Operations in a follow-up letter. FPC management did not consider the operators to be unsatisfactory to perform licensed duties, and no further evaluation was necessary at that time.

As noted in the subject Inspection Report, as a result of the Inspector's concern with this issue, FPC immediately conducted further evaluations of the seven operators, the SOTA and the instructor. Five of the seven operators were immediately given an evaluated walk-through of the "failed" scenario on the control board mock-ups at the training center, and all five operators performed satisfactorily. The other two operators were immediately returned to the simulator for additional training and were evaluated as being satisfactory on the scenario. As of August 31, 1986, all nine persons in question have returned to the simulator and have been evaluated as satisfactory on the "failed" scenario.

Additionally, at the time of the inspection, FPC had already revised TDP-203 (Revision 5, dated April 1, 1986) to clarify the requirements for special simulator evaluations and to prevent misinterpretation of this issue.