NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

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

During NRC inspections conducted on July 13 through August 16, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

A. 10 CFR 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by procedures, of a type appropriate to the circumstances, and shall be accomplished in accordance with these procedures.

Contrary to the above, on July 28, 1997, licensee personnel performed quality-related work to restore once-through steam generators during reduced reactor coolant system inventory operation without a written and approved procedure. Consequently, a step to secure the ventilation fan connected to the A once-through steam generator upper hand-holes prior to replacing the lower diaphragms and manways was omitted resulting in an indicated reactor coolant system level decrease.

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

B. Technical Specification 5.6.1.1, Procedures, requires that written procedures be established and implemented for activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978, including general procedures for the control of replacement and modification work.

Licensee Procedure NFP-254, Plant Equipment Equivalency Replacement Evaluation (PEERE), Revision 13, step V.A.2, defines one type of equipment replacement, equipment equivalency replacement, as replacing an item with another item which is different from the licensee specified requirements but which has been determined, through engineering evaluation, to be equivalent in that the replacement item fulfills the licensee required critical design characteristics and is equivalent in form, fit, function, and structural integrity. A note attached to that step states that in the case where a critical design characteristic is changed or where the replacement results in operational, functional, or performance changes, the replacement, or that portion of the replacement which represents the change, would require a modification approval record (MAR) or commercial grade work request (CGWR).

Contrary to the above, PEERE 1497 was issued on April 10, 1997, to document modifications made to the building spray pump impellers. These modifications were made to increase the Net Positive Suction Head (NPSH) margin for the pumps, which the PEERE identified as a critical characteristic of the pump. These modifications were performed under the PEERE process instead of the MAR process.

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

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C. 10 CFR 50.71(e), in part, requires licensees to update periodically the Final Safety Analysis Report (FSAR) originally submitted as part of the application for the operating license to assure that the information included in the FSAR contains the latest material developed. This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the licensee pursuant to Commission requirement since the submission of the original FSAR or, as appropriate, the last updated FSAR. The updated FSAR shall be revised to include the effects of all safety evaluations performed by the licensee in support of requested license amendments.

In support of its request for License Amendment No. 149, relating to improved technical specifications (ITS), the licensee proposed and the Commission approved (by issuance of License Amendment No. 149 and the accompanying safety evaluation report dated December 20, 1993) relocating the provisions for reactor coolant water chemistry from the then Technical Specifications (TS) 3.4.7 to the FSAR and appropriate plant procedures.

Contrary to the above, as of July 18, 1997, the licensee's updated FSAR, Revision 23, dated November 18, 1996, did not include the effects of the safety evaluation performed by the licensee in support of its requested License Amendment No. 149 for implementing the ITS in that the FSAR did not reflect information relating to the reactor coolant quality specifications pursuant to Commission requirement since the last updated FSAR.

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

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, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, at Crystal River, 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 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 12 day of Sept 1997

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No:	50-302
License No:	DPR-72
Report No:	50-302/97-11
Licensee:	Florida Power Corporation
Facility:	Crystal River 3 Nuclear Station
Location:	15760 West Power Line Street Crystal River, FL 34428-6708
Dates:	July 13 through August 16, 1997
Inspectors:	S. Cahill, Senior Resident Inspector T. Cooper, Resident Inspector S. Sanchez, Resident Inspector J. Bartley, Resident Inspector, Farley, paragraphs O8.1, R8.1 M. Miller, Reactor Inspector, paragraphs E1.1, E1.2, E8.1 - E8.9 W. Miller, Reactor Inspector, paragraphs F2.1, F2.2, F3.1, F5.1, F6.1, F7.1, F8.1, F8.2 R. Moore, Reactor Inspector, paragraphs O7.1, E7.2 R. Schin, Reactor Inspector, paragraph O7.1, E1.2, E7.2 M. Thomas, Reactor Inspector, paragraphs E1.1, E1.2, E7.1, E8.1 - E8.9 J. York, paragraph O7.1
Approved by:	K. Landis, Chief, Projects Branch 3 Division of Reactor Projects