

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on June 12 - July 9, 1987, violations of NRC requirements were identified. The violations involved failure to perform a surveillance test required by the Technical Specifications (TS), failure to adhere to plant procedures, failure to perform an adequate Inservice Testing (IST) program, failure to conduct a proper review and approval of Inservice Inspection (ISI) program procedures, and failure to retain records of the ISI program. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

- A. TS 4.8.2.1.2 requires that whenever a transformer is used to supply power to a 120 volt AC vital bus instead of the normal source of power, the transformer shall be demonstrated operable within 24 hours.

Contrary to the above, from 10:43 AM on July 2, 1987, until 5:15 PM on July 3, 1987 (approximately 30.5 hours), a transformer was utilized to supply power to the 120 volt AC Vital Bus 3A and this transformer was not demonstrated to be operable and functioning properly within 24 hours.

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

- B. TS 6.8.1 requires the establishment and implementation of written procedures for those activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, and for surveillance activities of safety-related equipment.

Regulatory Guide 1.33, Appendix A, Section A.3, recommends a procedure for equipment control.

Compliance procedure CP-115, In-Plant Equipment Clearance and Switching Orders, was written to meet the requirements of Regulatory Guide 1.33 and specifies in step 5.3.6.h that the return-to-normal position of the valve, switch, or breaker after removal of a tag shall be obtained from the applicable procedure.

Surveillance procedure SP-650, ASME Code Safety Valves Test, step 8.2.4 requires that the steam system be at a pressure in the range of 885-910 psig for in place testing of Main Steam Safety Valves (MSSV).

Surveillance procedure SP-333, Control Rod Exercises, steps 9.1.57 through 9.1.60, provide the steps needed to restore the control rod drive system to the normal configuration.

Contrary to the above:

1. On June 19, 1987, procedure CP-115 was not implemented in that an equipment clearance directed valve SWV-14 to be restored to a position contrary to that required by the appropriate system operating procedure. This resulted in the valve being restored to the incorrect position upon removal of the tag.
2. On July 7, 1987, procedure SP-650 was performed to test a MSSV in place with a steam system pressure of 920 psig.
3. On July 3, 1987, procedure SP-333 was not implemented in that steps 9.1.57 through 9.1.60 were not performed while restoring the control rod drive system to the normal configuration.

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

- C. TS 4.0.5.b requires the performance of IST of ASME Code Class 1, 2 and 3 pumps and valves in accordance with Section XI of the ASME Boiler and Pressure Vessel Code pursuant to the requirements of 10 CFR 50, Section 50.55a(g).

In letters dated June 4, 1982, June 14, 1983, July 1, 1985, and October 22, 1985, the NRC directed the licensee to implement their proposed IST program pursuant to the requirements of 10 CFR 50.55a(g).

Contrary to the above, as of July 9, 1987, the proposed IST program was not properly implemented in that two pumps and thirty valves identified in the program as requiring testing were not being tested.

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

- D. TS 6.8.2.b requires procedures for surveillance and test activities and changes thereto be reviewed and approved by an intradepartmental qualified reviewer and an interdisciplinary qualified reviewer in interfacing departments prior to implementation. This TS also requires that the Plant Review Committee (PRC) review the 10 CFR 50.59 evaluation within 14 days of approval.

ISI activity procedures are listed as a surveillance and test activity under TS 4.0.5.b.

Contrary to the above, as of July 9, 1987, procedures used to conduct the 1980 Outage #3 ISI program, the 1983 Outage #5 ISI program, and changes to the 1985 Outage #6 ISI program were not reviewed and approved prior to implementation as required by TS 6.8.2.b. In addition, the 10 CFR 50.59 evaluation reviews were not performed by the PRC.

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

- E. TS 6.10.2.h requires records of ISI performed pursuant to the TS be retained for the duration of the Facility Operating License.

Contrary to the above, as of July 8, 1987, records delineating hydrostatic testing boundaries for ISI tests performed in the 1980 Outage #3 and the 1983 Outage #5 were not retained. As a result the adequacy of four hydrostatic tests performed in the 1980 Outage #3 could not be determined.

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 to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

(Original signed by L. Reyes)

Luis A. Reyes, Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this 5th day of August 1987