



**Florida
Power**
CORPORATION

June 26, 1987
3F0687-18

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Inspection Report 87-10
Revised Response

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our revised response to the subject Inspection Report. This response was revised to address the frequency of channel calibration on the reactor coolant flow rate.

Sincerely,

E. C. Simpson
Director, Nuclear
Operations Site Support

WLR:MSM:mag

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator, Region II

Mr. T. F. Stetka
Senior Resident Inspector

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FLORIDA POWER CORPORATION
REVISED RESPONSE
INSPECTION REPORT 87-10

VIOLATION 87-10-02

- A. Technical Specification 4.3.3.6 requires that the post accident monitoring instrumentation, including recorders, be demonstrated operable by the performance of monthly channel checks and quarterly or refueling interval channel calibrations.

Contrary to the above, as of April 2, 1987, monthly channel checks on the recorders for the following post accident monitoring instrumentation were not performed: Power Range Nuclear Flux, Source Range Nuclear Flux, Reactor Coolant Outlet Temperature, and Borated Water Storage Tank Level. In addition, quarterly channel calibrations for the Power Range Nuclear Flux recorder and refueling interval calibration of the Reactor Coolant Total Flow Rate recorder were not performed.

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

RESPONSE

1. Florida Power Corporation's Position

Florida Power Corporation (FPC) accepts the violation. Channel calibrations are being performed on reactor coolant total flow rate (RC-13-FR) under procedure PM-250, Calibration of Recorders. However, they were not consistently being performed on a refueling interval.

2. Apparent Cause of Violation

- A. Amendment 60 to Technical Specification 4.3.3.6 added the requirement for channel checks and channel calibrations to be performed on post accident monitoring instrumentation recorders. LER 83-62 identified that several of the channel checks were not being performed. Appropriate procedure changes were initiated at that time to correct this deficiency. However, the corrective action assignment to implement the channel checks was prematurely closed when the proposed revision was submitted for approval and the procedure change was never issued.
- B. As a result of the issuance of Amendment 60, all post accident recorders except NI-005-NIR were required to be calibrated every refueling. The calibration frequency for NI-005-NIR was specified as quarterly. During the review of Amendment 60, the difference in calibration frequency was not noticed.

3. Corrective Actions

- A. SP-300, Operating Daily Surveillance Log, has been revised to include a channel check for power range nuclear flux (NI-005-NIR), source range nuclear flux (NI-009-NR), reactor coolant outlet temperature (RC-004-TR) and BWST Level and RB pressure (BS-065-PR).
- B. Upon notification of the violation, the NI-005-NIR post accident monitoring (PAM) channel was declared inoperable, and the applicable action statement was entered. Technical specification 4.3.3.6 was interpreted by Florida Power Corporation to apply to the power range flux post accident recorder (NI-005-NIR) only. It was FPC's position that due to difficulty of calibrating this equipment while in Mode 1 or 2, the portions of the string that do not support Reactor Protection System functions would still require calibration once a refueling. This was based upon concern that the only apparent method for achieving a full calibration involved placing several ICS stations in "Hand" simultaneously and concurrent entry into two reactor protection cabinets. The recorder was bench calibrated, and the action statement was exited.

Following discussions with the NRC on May 26, 1987, it was agreed that the proper interpretation of the technical specification included all components of the instrumentation string. As a result the action statement was re-entered on May 27, 1987.

All other PAM recorders were verified as being calibrated.

4. Date of Full Compliance

- A. The change to SP-300 to address post accident monitoring instrument channel checks was implemented on April 13, 1987.
- B. FPC has evaluated various methods for performing a calibration of all active components in the NI-005-NIR string while minimizing impact and risks to the plant. This methodology was discussed with the NRC on June 8, 1987. FPC's power range nuclear instrumentation calibration procedure will be revised to reflect this methodology. Calibration of the NI-005-NIR string will be accomplished by June 26, 1987.

5. Action Taken to Prevent Recurrence

- A. FPC no longer accepts the initiation of a procedure change to satisfy a corrective action. Current FPC procedures requires verification of corrective actions prior to the closing of corrective action assignments.
- B. There is no technical reason that the power range flux post accident recorder should require more frequent calibrations than any other post accident recorders. A technical specification change will be initiated to change the calibration frequency of the power range flux post accident recorder to once per 18 months.

PM-250 has been changed to perform the channel calibration check for RC-13-FR on an 18-month cycle.