Florida Power
CORPORATION

May 10, 1989
3F0589-11

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License DPR-72
Inspection Report 89-01, Items 01 and 02

Dear Sir:

Florida Power Corporation provides the attached response to NRC Inspection Report 89-01, items 01 and 02.

Should there be any questions, please contact this office.

Very truly yours,

Rolf C. Widell
Director, Nuclear Operations Site Support

WLR/sjm

Attachments

cc: Regional Administrator, Region II
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 89-01
REPLY TO NOTICE OF VIOLATION

VIOLATION 89-01-01

Technical Specification (TS) 3.6.3.1 requires the containment isolation valves specified in Table 3.6-1 to be operable in Modes 1, 2, 3, and 4.

Contrary to the above, Crystal River 3 was operated in Modes 1, 2, 3, and 4 with containment isolation valves MSV-130, MSV-148, CAV-6, and CAV-7 inoperable due to undersized air solenoid valves from November 8, 1988 to January 7, 1989.

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

FLORIDA POWER CORPORATION RESPONSE

Florida Power Corporation (FPC) accepts the violation. This violation was reported in accordance with 10CFR50.73 as LER 89-01. MSV-130 and MSV-148 were inoperable from November 8, 1988 to January 7, 1989. This was due to the solenoid valves for the MSV-130 and 148 air operators being subjected to conditions which exceeded their design maximum operating pressure differential (MOPD). An investigation was conducted to determine if other air operated valves had similar deficiencies. During this review, CAV-6 and CAV-7 were also found to be deficient.

APPARENT CAUSE OF VIOLATION

The cause of the violation was lack of sufficient information on the originally supplied drawings. FPC drawings associated with MSV-130 and MSV-148 did not provide the model or part number of the solenoid valves designed into the valve operator controls. Consequently, when maintenance was performed on these devices, errors were made in the selection and installation of replacement solenoids.

CORRECTIVE ACTION

Upon discovery that the solenoid valves for MSV-130 and MSV-148 were nonconforming, a thorough review of design documentation for all safety-related solenoid valves for pneumatic operators was conducted to ensure that the design MOPD rating was adequate for the valve application. Full investigation was made of those solenoids where documentation showed any inconsistency. This resulted in the identification of CAV-6 and 7 solenoid valve deficiencies. These four solenoid valves were replaced and tested.

DATE OF FULL COMPLIANCE

FPC was in full compliance for these valves on January 13, 1989 upon installation and testing of these valves.

ACTIONS TAKEN TO PREVENT RECURRENCE

All safety-related solenoid valve designs for pneumatic operators have been verified to be in accordance with the system requirements. The installation has also been verified to be in accordance with design requirements. Appropriate design documentation for all safety related solenoid valves have been reviewed and are being updated to reflect the correct solenoid valve model, thereby providing clear design requirements for subsequent maintenance activities.

VIOLATION 89-01-02

10CFR50, Appendix B, Criterion XVI states that measures shall be established to assure that conditions adverse to quality, such as defective material and equipment and nonconformances are promptly identified and corrected.

Contrary to the above, undersized air solenoid valves on valves MSV-130 and MSV-148 were documented by the Licensee on a Field Problem Report (FPR) to Engineering on November 8, 1988 and the FPR was evaluated as not a regulatory or safety issue even though NRC Information Notice No. 88-24 issued on May 13, 1988 identified the potential for and consequences of undersized air solenoid valves. This condition existed until January 7, 1989 when a Nonconforming Operations Report was written to document a re-evaluation of the issue and the valves were declared inoperable.

This is a Severity Level IV violation.

FLORIDA POWER CORPORATION RESPONSE

Florida Power Corporation (FPC) accepts the violation.

FPC acknowledges Field Problem Report T-88-0105 dated November 8, 1988 identified solenoid valves for MSV-130 and MSV-148 had exceeded their Maximum Operating Pressure Differential (MOPD). The solenoids were designed for an application of 40 psi but were used in a 125 psi application. FPC further acknowledges that the response by Site Nuclear Engineering Services (SNES) was not rendered in a timely manner. At the time the FPR was evaluated for priority and reportability, MSV-130 and MSV-148 were not recognized as containment isolation valves and a manual valve upstream was closed by procedure during normal operation.

APPARENT CAUSE OF VIOLATION

The supervisory review of FPR T-88-105 resulted in a failure to identify that the subject solenoid valves were installed on containment isolation valves, thus the significance of the installation design discrepancy was not recognized. Further, the supervisor was informed at the time that the upstream blocking valves for these valves were normally kept closed by procedure. As a consequence, a lower priority was assigned for the completion of the final review of the FPR. The engineer responsible for this review responded to its indicated priority and so concentrated his efforts on more immediate tasks.

CORRECTIVE ACTION

Engineering Supervision has been counseled by SNES management on the importance of prompt, correct evaluations of plant problem reports The FPR evaluation process now requires that a nonconformance check sheet be completed when the problem is identified. This will assure conditions adverse to quality are promptly identified and evaluated for corrective actions and preliminary reportability.

DATE OF FULL COMPLIANCE

The above corrective actions were completed on January 20, 1989.

ACTIONS TAKEN TO PREVENT RECURRENCE

The above actions should be sufficient to prevent recurrence. Additional programmatic changes for Engineering and the nonconformance/corrective action process are addressed in FPC's response to the SALP report.