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**Florida
Power**

22 June 1979
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CS-79-186

Mr. J. P. O'Reilly, Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 3100
Atlanta, GA 30303

Docket No. 50-302
License No. DPR-72
Ref: RII:TJMcH
50-302/79-13

Dear Mr. O'Reilly:

We offer the following responses to the apparent items of Noncompliance in the referenced Inspection Report.

NOTICE OF VIOLATION

- A. As required by Technical Specification 4.8.3, temporary changes to procedures may be made provided that the change is approved by two (2) members of plant management staff, at least one of whom holds a Senior Reactor Operator's license on the affected unit.

Contrary to the above, during the period of April 24-26, 1979, temporary changes were made to Operating Procedure OP-209, Plant Cutdown, and to Surveillance Procedure SP-417, Refueling Internal Integrated Plant Response to Engineered Safeguards, without prior approval by members of plant management.

- A. Response: As stated in Section 10a of the Details in the referenced Inspection Report, SP-417 was performed at a temperature of about 300°F instead of the required temperature between 200 and 250°F. As explained to the inspector, when this error was discovered, the existing plant condition did not warrant actions necessary to maintain the required temperature. A decision was then made by two (2) Senior Reactor License Holders to make an after-the-fact temporary change to Section 7.2.14.1 of SP-417. We contend this action was permitted under the existing condition.

As stated in Section 10b of the Details in the referenced Inspection Report, Step 7.2.14.1 of OP-209 required a nitrogen blanket be placed on the steam generators. As the secondary side of the steam generators was to be opened to atmosphere, the inspector was informed that the nitrogen blanket was not applicable. Step 7.2.14.1 of OP-209 was marked with a note explaining the reason for not placing the blanket on the DSG's. However, Step 7.2.14.1 of OP-209 has been revised to allow this procedural step to be signed off if nitrogen blanketing of the DSG's is not required.

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All concerned personnel have been cautioned that any variance from approved procedures must be implemented by approved procedural controls.

Compliance has been achieved this date.

- B. As required by Technical Specification 4.4.6.2.b, the Reactor Building sump inventory and discharge must be monitored at least once per 12 hours.

Contrary to the above, during the period of April 17-19, 1979, the Reactor Building sump inventory and discharge were not monitored for a period of about thirty-five (35) hours.

- B. Response: It was, at the time of the inspection, and it remains our contention that no violation existed. The Reactor Building sump was monitored as required and recorded as "off-scale high" on the shift logs for the time span in question, and no discharges were made as the sump pump controls were in "pull to lock" configuration. This was to prevent overflowing the miscellaneous waste storage tank (MWST) whose level was at the high alarm point.

The RCS leakage determination does not utilize the RB sump inventory and discharge to calculate the primary system leak rate. Therefore, the monitoring of the RB sump, "off-scale high" meets the surveillance requirement of Technical Specifications.

There were two (2) alternatives to operating this condition. One was to shut down the plant, which would have created additional waste problems, and the other would have been to pump out the sump and overflow the MWST. As neither of these two alternatives was acceptable, it was determined to accept the known high level in the RB sump and to maintain discharges when space was available.

Should there be further questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION



W. P. Stewart
Manager, Nuclear Operations



Nuclear Plant Manager

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