



**Florida
Power**
CORPORATION

28 August 1979
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CS-79-250

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
Licensee No. DPR-72
Ref: RII: HDJ
50-302/79-27

Dear Mr. O'Reilly:

We offer the following response to the apparent Item of Noncompliance in the referenced inspection report.

NOTICE OF VIOLATION

As required by 10 CFR 50, Appendix B, Criterion V, "Activities affecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with these instructions and procedures". The licensee's accepted QA Program, Section 1.7.6.7.1e, states in part, "Florida Power Corporation's Quality Program contains requirements and procedures to assure that each of the eighteen (18) criteria within 10 CFR 50, Appendix B are delineated, accomplished, and controlled by documented procedures. Written procedures shall be strictly adhered-to in all matters relating to nuclear safety..." CP-114, Procedure for Control of Permanent Modifications, Temporary Modifications, and Deviations, Page 5, Paragraph 3.4.2 requires that the Plant Review Committee review all modifications upon completion for completeness of testing requirements, NDE findings, etc.

Contrary to the above, safety-related temporary modifications were completed and final records were stored without Plant Review Committee review of testing completeness since implementation of Revision 17 to CP-114, dated February 23, 1979.

Response: A procedure revision to Compliance Procedure CP-114 has been submitted and will be implemented by 15 September 1979. This impending revision will: 1) Section 3.4.2 will require the Plant Review Committee to review all safety-related temporary modifications to ensure completeness of testing requirements, NDE findings, document revision completion, and other pertinent information, and 2) Enclosure two (2) of CP-114 will be revised to include the PRC Chairman to sign to verify that the PRC has reviewed post modification testing of the temporary modification.

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In response to the Notice of Deviation of the referenced inspection report, the following is offered:

- 1) Item A - CP-114 enclosure two (2) was revised and implemented on 9 August 1979. The revision was late being implemented as committed-to due to numerous procedure revisions required by the Unit Startup Order of 17 May 1979. To prevent recurrence of this deviation, Procedure Review Records, requesting revisions to procedures, will be annotated as the NRC commitment dates. Full compliance has been achieved as of this date.
- 2) Item G - Florida Power's earlier response contained an error wherein we stated that QOP 2.0 had been revised rather than reviewed on April 2, 1979 to provide better control of training operations.

As a result of that review, additional actions were identified and included in our response as future corrective action. Progress to date has included selection of a contractor to provide support in the establishment of a certification program for storeroom personnel. Subsequent steps will include:

- 1) Publication of certification criteria
- 2) Certification of storeroom personnel
- 3) Certification of offsite personnel by their respective areas
- 4) Procedural revisions to accomplish the above.

Full compliance will be achieved by September 15, 1979.

- 3) Item H - QAP-8, Quality Program Audits, has been revised to require all Quality Program Department Audits to include an evaluation statement regarding the effectiveness of the quality assurance program elements which were audited. In addition, a departmental training session was held to assure understanding of this requirement by our auditors. Full compliance has been achieved.

Should there be further questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION

W. P. Stewart

W. P. Stewart
Manager, Nuclear Operations

J. P. O'Reilly
Nuclear Plant Manager

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