

**Florida
Power**
CORPORATION

5 October 1979

3-0-3-a-2
CS-79-285

Docket No. 50-302
Licensee No. DPR-72
Ref: RII:RCS
50-302/79-30

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

Dear Mr. O'Reilly:

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

NOTICE OF VIOLATION

- A. As required by Technical Specification 3.1.3.4, individual safety and regulating rod drop times from the fully withdrawn position shall be verified to be less than, or equal to, 1.66 seconds from power interruption at the control rod drive breakers to 3/4 insertion (25%) prior to proceeding to Mode 1 and 2.

Contrary to the above, Mode 2 was entered on July 29, 1979, although rod drop data, obtained on July 27, 1979 could not be verified to meet the 1.66 second time requirement, since no timing marks appeared on the oscillograph paper used in the measurements. Alternate verification of the acceptability of rod drop time results was not performed until August 8, 13, and 14, 1979.

A. Response:

To ensure acceptability, the original rod drop time as per Surveillance Procedure SP-102, "Control Rod Drop Time Test", relied upon the visicorder chart speed for determining rod drop time. A subsequent verification of chart drive accuracy determined the acceptability of the rod drop time results.

Surveillance Procedure SP-102 has been revised to require a 60 hertz timing-signal reference trace be present on the visicorder oscillograph paper. The presence of this timing trace will adequately verify rod drop time, meeting the acceptance criteria of Technical Specification 3.1.3.4. Full compliance has been achieved.

- B. As required by Technical Specification 6.8.1, as implemented by the Crystal River Plant Operating Quality Assurance Manual Control Document, AI-400, written procedures shall be established, implemented, maintained, and followed step-by-step.

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Notice of Violation - Responses

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B. Continued:

Contrary to the aforementioned, on July 27, 1979, the reactor coolant loop RTD normalization constants, as calculated by the IBM-5100 RTD Normalization Routine, were not input into the IBM-5100 Heat Balance 11 routine as required by step 12, Enclosure 1 of PT-100 prior to the first heat balance taken at approximately 15% FP per PT-120. The constants were not properly input into the computer software until August 6, 1979 at a power level of 75%.

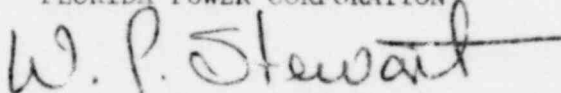
B. Response:

A review of PT-100, Controlling Procedure for Pre-critical Testing, indicated that the method of changing the RTD Normalization Constants was not addressed. To avoid further noncompliance, PT-100 has been revised to clarify the method for inputting the constants into the IBM-5100 Normalization Routine, and concerned personnel have been instructed as to its requirements. Full compliance has been achieved.

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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