Florida Power
CORPORATION

August 11, 1983
3F-0883-10

Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 83-10

Dear Mr. O'Reilly:

By letter dated August 5, 1983, Florida Power Corporation requested an extension to respond to the subject inspection report. Attached is the response to the violations identified in the inspection report.

Sincerely,

G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

Attachment

GRW:mm

INSPECTION REPORT 83-10
August 11, 1983

A. VIOLATION

Technical Specification 3.6.3.1 requires that containment isolation valves specified in Table 3.6-1 shall be operable with isolation times as shown in Table 3.6-1. With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, either:....b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or...d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Contrary to the above on March 19, 1983, at 1:15 p.m. during hot standby operation:

1. An inoperable containment isolation valve previously isolated on January 20, 1983, in accordance with item b above, was reopened.

2. Subsequent to opening of the above isolation valve, the plant was not placed in COLD SHUTDOWN within the following 30 hours. COLD SHUTDOWN was achieved on March 21 at 9:05 p.m. (55 hours and 50 minutes) after the valve was reopened.

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

A. RESPONSE

EXAMPLE 1

(1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation agrees that the ACTION b of Technical Specification (Tech Spec) 3.6.3.1 was terminated at the time CAV-4 and 6 were reopened to obtain a chemistry sample from the Once Through Steam Generator "A" (OTSG-A). Furthermore, Florida Power Corporation now understands the NRC position that exit from an ACTION statement based on entry into an alternate section of the same ACTION statement is not permissible.

(2) DESIGNATION OF APPARENT CAUSE: This was caused by an interpretation of the required action when a containment isolation valve is inoperable per Tech Spec 3.6.3.1.

Tech Spec 3.6.3.1 requires entry into ACTION a or b or c or d when a containment isolation valve is determined to be inoperable. While in general, an ACTION statement cannot be terminated (exited) unless the Limiting Condition of Operation is satisfied (i.e., the equipment is returned to operability); Tech Spec 3.6.3.1 neither specifically states that an ACTION may be terminated if another ACTION statement can be met, nor states that changing from one ACTION to another is not allowed.

In the case cited, sampling of the Once Through Steam Generator (opening CAV-4 and 6) was necessary to meet the requirements of Environmental Technical Specification (Appendix B) 2.4.1.O and other chemistry sampling. The personnel involved judged that the intent and requirements of Tech Spec 3.6.3.1 could be satisfied by switching from ACTION b (isolate the penetration) to ACTION d (initiate unit shutdown), while retaining the ability to take the required samples.

(3) IMMEDIATE CORRECTIVE ACTIONS: Responsible personnel within FPC have been informed that exit from an ACTION statement in Tech Spec 3.6.3.1 based on entry into an alternate ACTION statement is not permissible.

(4) LONG TERM CORRECTIVE ACTIONS: Florida Power Corporation will submit a clarification or a change to Tech Spec 3.6.3.1 to allow intermittent operation of necessary valves to preclude a recurrence of this violation.

(5) DATE OF FULL COMPLIANCE: Full compliance was achieved on August 1, 1983.

EXAMPLE 2

(1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation agrees that the requirements of Tech Spec 3.6.3.1 ACTION d (COLD SHUTDOWN in 30 hours) was not met. However, ACTION d was only exceeded by 5 hours and 15 minutes before reentry into ACTION b (to isolate the penetration). Per EXAMPLE 1 above, FPC understands switching ACTION statements is not allowable.

(2) DESIGNATION OF APPARENT CAUSE: This violation was caused by a misinterpretation of ACTION d of Tech Spec 3.6.3.1 and the inability to reach COLD SHUTDOWN in the required time period. ACTION d can be interpreted to require COLD SHUTDOWN within either 36 or 30 hours if the plant is already in HOT STANDBY.

(3) IMMEDIATE CORRECTIVE ACTIONS: Responsible personnel have been informed of the standard interpretation of ACTION d of Tech Spec 3.6.3.1.

(4) LONG TERM CORRECTIVE ACTIONS: Florida Power Corporation will submit a clarification or a change to Tech Spec 3.6.3.1 as mentioned above.

(5) DATE OF FULL COMPLIANCE: Full compliance was achieved on August 1, 1983.

B. **VIOLATION**

Technical Specification 6.8.1 requires procedures as recommended in Appendix A of Regulatory Guide 1.33 dated November 1972.

Regulatory Guide 1.33, Appendix A requires a procedure for changing modes of operation of the Decay Heat Removal System.

Procedure OP-404, Decay Heat Removal System, provides the procedure for various modes of operation for the Decay Heat Removal System.

Contrary to the above, during the period of 1320 on April 14 through 0755 on April 15, the Decay Heat Removal System was used to drain and fill the fuel transfer canal, a mode of operation that is not covered by procedure OP-404 or any other operating procedure.

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

B. **RESPONSE**

(1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation agrees that a written procedure should have been used to perform the activity described above.

(2) DESIGNATION OF APPARENT CAUSE: This violation was caused by personnel error. Responsible personnel decided that using the Decay Heat Removal System to fill the fuel transfer canal was a simple operation that could be adequately performed under the instructions of equipment clearances and the administrative control of the Shift Supervisor.

When the Decay Heat System is in the recirculation mode, it is possible to fill the Fuel Transfer Canal by interconnecting Borated Water Storage Tank (BWST) and the DH system. This is a simple operation involving opening one valve. By opening this valve the DH system will add more water to the reactor vessel than is being removed. Consequently borated water is added to the Fuel Transfer Canal from the BWST via the reactor vessel.

(3) IMMEDIATE CORRECTIVE ACTION: Responsible personnel were instructed to use a procedure when using the Decay Heat Removal System to fill the fuel transfer canal.

(4) LONG TERM CORRECTIVE ACTION: If this activity is performed again, a procedure will be developed or changed to cover this specific mode of operation.

(5) DATE OF FULL COMPLIANCE: Full compliance was achieved on August 1, 1983.