

**Florida  
Power**  
CORPORATION

October 13, 1982

#3F-1082-14

File: 3-0-3-a-2

Mr. J. P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 3100  
Atlanta, Ga. 30303

SUBJECT: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
IE Inspection Report 82-20

Dear Mr. O'Reilly:

Florida Power Corporation (FPC) offers the following response to the violation listed in the inspection report transmitted to FPC by letter dated September 13, 1982.

NOTICE OF VIOLATION:

- A. Technical Specification 4.6.3.1.1 states that primary containment isolation valves shall be demonstrated operable after maintenance, by performance of a cycling test and by verification of isolation time.

Contrary to the above, an isolation time test was not performed on containment isolation valve SWV-110 after maintenance was performed on February 24, 1982.

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

RESPONSE:

- A. Florida Power Corporation concurs with the stated violation. This failure to perform the required maintenance was caused by a misunderstanding of the Specification's full intent. At the time of the event, the work done on the containment isolation valve, SWV-110, was not considered to be maintenance requiring verification of isolation time. However, SWV-110 was stroke tested.

To prevent further violations of this kind, a special training class was held on August 25, 1982, for the Planning Coordinators to clarify the related procedures.

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As discussed with members of your staff, Florida Power Corporation does not consider SWV-110 to be inoperable as the maintenance performed was unlikely to affect the stroke time. Valve SWV-110 will be tested for verification of isolation time during the next outage of sufficient duration.

#### NOTICE OF VIOLATION

- B. Technical Specification 6.5.2.11 requires that audits be distributed to management positions within 30 days after completion of the audit.

Contrary to the above, of fifteen audits reviewed, three (QP-214, QP-215 and QP-217) were distributed to management 32-34 days after the end of each audit.

This is a Severity Level V Violation (Supplement 1).

#### RESPONSE:

- B. Florida Power Corporation concurs with the stated violation. The cause of this event was due to the insufficient time provided for management review and approval of audit reports prior to issuance. Therefore, to correct this situation, we have revised our internal auditing procedure (QAP-8, "Quality Program Audits") Section 6.5, Audit Reports, to require:

"The report is to be prepared, reviewed by auditors, technical advisor(s), and NGRC Liaisons and signed by each within fourteen days after Post-Audit Conference. The signed report is submitted to the Supervisor, Quality Audits, for review and approval.

The report is reviewed and approved by the Supervisor, Quality Audits, and then forwarded to the Director, Quality Programs, for his approval. Copies are transmitted by cover letter to the Quality Programs Audit File, to the Secretary, NGRC, to the management of the audited organization, to the Senior Vice President, Engineering and Construction, to the Plant Quality Document File, and other FPC departments, as applicable. The Audit Report shall be issued within thirty days after the final Post-Audit Conference."

We feel that the requirement that the Audit Team Leader complete the Audit Report within fourteen days after the Post-Audit Conference will provide sufficient time (sixteen days) for the management review and approval process and insure issuance of Audit Reports within the required thirty day time frame.

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NOTICE OF VIOLATION

- C. Technical Specification 6.5.1.5 requires that a quorum of five members be present in order to conduct Plant Review Committee meetings.

Contrary to the above, of the 34 meeting minutes reviewed, 3 meetings (81-24, 81-26, and 81-39) were conducted with only 4 members present.

This is a Severity Level V Violation (Supplemental 1).

RESPONSE

- C. Florida Power Corporation concurs with the stated violation.

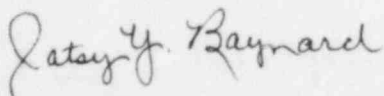
This violation resulted from insufficient documentation of Plant Review Committee (PRC) meeting attendance. Although the required number of members and alternates were present to constitute a quorum, the attendance record does not accurately reflect that quorum requirements are met. At the meetings cited, some attendees were confused as to which blank, i.e., member, alternate, visitor, each person should have used.

Corrective action was taken on November 25, 1981, as a result of a similar violation identified in NRC Inspection 81-11. A letter was sent to all departments, updating and clarifying current PRC members and their designated alternates. The meetings in NRC Inspection 82-20 were conducted during the period Crystal River Unit 3 was initially responding to and taking corrective action to NRC Inspection 81-11. Since November 25, 1981, there has not been a recurrence of this problem.

On August 13, 1982, the PRC sign-in sheet was revised to ensure that prior to conduct of the meeting, it is evident that quorum requirements are met.

Should there be further questions, please contact this office.

Very truly yours,



Dr. P.Y. Baynard  
Assistant to Vice President  
Nuclear Operations

PGH/mlg

cc: Document Control Desk