



**Florida
Power**
CORPORATION

April 2, 1990
3F0490-03

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Response to Generic Letter 90-01
NRC Regulatory Impact Survey

Dear Sir:

Enclosed please find Florida Power Corporation's (FPC) voluntary response to the NRC Regulatory Impact Survey for the areas inspected at Crystal River Unit 3 as requested in Generic Letter 90-01. FPC developed the data requested in the survey in accordance with the guidance provided by NUMARC in correspondence dated February 16, 1990.

Should there be any questions, please contact Rolf C. Widell, Director, Nuclear Operations Site Support.

Sincerely,

P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

WLR:mag

Att.

xc: Regional Administrator, Region II
Senior Resident Inspector
James G. Partlow - NRC, Region II
NUMARC

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC Team Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted: FPC has had four NRC Team Inspections in the past two years (OSTI, EOP, EQ, and Procurement/Vendor Technical)

3. Operations/Construction areas covered: Information not necessary based on instructions contained in the Generic Letter.

4. Extent of the activity (how many people, for how long): Eight to ten inspectors on site for two weeks.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 620 (number involved) 8
 - b. Plant Manager 10
 - c. Corporate Department Heads 170 (number involved) 6
 - d. Corporate Vice Presidents 100 (number involved) 1
 - e. Chief Nuclear Officer 80
 - f. Managers/Supervisors, etc. 4856 (number involved) 80

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Other NRC Resident, Regional and Headquarter Inspections/Audits
2. Based on actual experience over the past several years, about how often is this activity conducted: One Resident Inspection per month; an average of two Regional/Headquarter inspections per month.
3. Operations/Construction areas covered: Information not necessary based on instructions contained in the Generic Letter.
4. Extent of the activity (how many people, for how long) Inspections typically consist of one or two inspectors who are on site for one work week.
5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 493 (number involved) 8
 - b. Plant Manager 50
 - c. Corporate Department Heads 150 (number involved) 5
 - d. Corporate Vice Presidents 100 (number involved) 1
 - e. Chief Nuclear Officer 80
 - f. Managers/Supervisors, etc. 3463 (number involved) 87

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO Evaluations/Visits
2. Based on actual experience over the past several years, about how often is this activity conducted: INPO Site evaluations are normally conducted on an eighteen month interval.
3. Operations/Construction areas covered: Information not necessary based on instructions contained in the Generic Letter. However, FPC had a Casualty Control Drill in 1990 that is represented as a separate figure below.*
4. Extent of the activity (how many people, for how long)
An INPO evaluation team typically consists of twenty people. The team is on site for a period of two weeks.
5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 489 (number involved) 8
 - b. Plant Manager 50
 - c. Corporate Department Heads 100 (number involved) 5
 - d. Corporate Vice Presidents 100 (number involved) 1
 - e. Chief Nuclear Officer 80
 - f. Managers/Supervisors, etc. 3369 (number involved) 96
*Casualty Control Drill 2200 150

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Insurance (Factory Mutual, ANI/MAELU, ANI/FIRE)
2. Based on actual experience over the past several years, about how often is this activity conducted: Liability insurance and Factory Mutual usually inspect once a year; Fire insurance usually twice a year. In addition, both usually inspect during a refueling outage.
3. Operations/Construction areas covered: Areas covered usually include maintenance, surveillance, radiological controls, operations, fire and inservice inspections.
4. Extent of the activity (how many people, for how long)
An insurance inspection typically consists of two or three inspectors, on site for two or three days.
5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 85 (number involved) 5
 - b. Plant Manager 5
 - c. Corporate Department Heads 20 (number involved) 1
 - d. Corporate Vice Presidents 20 (number involved) 1
 - e. Chief Nuclear Officer 0
 - f. Managers/Supervisors, etc. 522 (number involved) 41

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Environmental Protection Agency
2. Based on actual experience over the past several years, about how often is this activity conducted: Once per year
3. Operations/Construction areas covered: Wastewater systems and Spill Prevention Control and Countermeasure Plan, hazardous waste storage and effluent releases.
4. Extent of the activity (how many people, for how long):
One or two inspectors for approximately one day.
5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 5 (number involved) 1
 - b. Plant Manager 0
 - c. Corporate Department Heads 5 (number involved) 1
 - d. Corporate Vice Presidents 0 (number involved) 0
 - e. Chief Nuclear Officer 0
 - f. Managers/Supervisors, etc. 48 (number involved) 4

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC-Required QA Audits
2. Based on actual experience over the past several years, about how often is this activity conducted: FPCs Quality Programs Department conducts monthly audits covering Appendix 3 Criterion 1 thru 18.
3. Operations/Construction areas covered: Information not required based on instructions for the Generic Letter.
4. Extent of the activity (how many people, for how long)
Five to seven auditors, two weeks on site each month.
5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 752 (number involved) 8
 - b. Plant Manager 100
 - c. Corporate Department Heads 100 (number involved) 5
 - d. Corporate Vice Presidents 100 (number involved) 1
 - e. Chief Nuclear Officer 80
 - f. Managers/Supervisors, etc. 3738 (number involved) 78

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: State/Local Authorities
2. Based on actual experience over the past several years, about how often is this activity conducted: A State Official is present for each Radiological Shipment, approximately forty each year.
3. Operations/Construction areas covered: The inspector verifys each shipment is safe for transport.
4. Extent of the activity (how many people, for how long)
One inspector for approximately two hours.
5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1.
 - a. Plant Department Heads 0 (number involved) 0
 - b. Plant Manager 0
 - c. Corporate Department Heads 0 (number involved) 0
 - d. Corporate Vice Presidents 0 (number involved) 0
 - e. Chief Nuclear Officer 0
 - f. Managers/Supervisors, etc. 80 (number involved) 1