

REGIONAL REGION
ATLANTA, GEORGIA

42 JUN 2 10:34

**Florida
Power**
CORPORATION

May 27, 1982
#3F-0582-26
File: 3-0-3-a-2

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

SUBJECT: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Inspection Report RII/50-302-81-23

Dear Mr. O'Reilly:

Florida Power Corporation (FPC) has just been apprised that our initial response to I.E. Inspection No. 50-302/81-23 was never received by your office. Upon investigation, we cannot confirm the response was submitted. FPC hereby submits the required response. FPC considers this reporting situation as a unique case, however, improved administrative controls have already been initiated to reduce the potential for late responses. Increased diligence will be exercised in an effort to avoid any future late Inspection Report responses.

FPC offers the following response to the violation listed in the subject inspection report.

VIOLATION

Technical Specification 4.3.1.1.1 requires a channel calibration of reactor coolant system (RCS) outlet temperature every 18 months.

Technical Specification Definition 1.9 requires a channel calibration to encompass the entire channel including the sensor.

Contrary to the above, as of November 12, 1981, the procedure used to calibrate RCS outlet temperature did not encompass the channel sensor (resistance temperature detector).

RESPONSE

FPC accepts this violation. The requirement to calibrate the sensor was not included when procedures were developed for calibration of these channels. The corrective action taken was to replace all of the T-Hot RTD's and their bridges with new units with known calibrated resistance curves. Procedures will be revised to include the sensor (RTD) in future channel calibrations. The removed RTD's are being calibrated to determine if further corrective actions are needed.

8207010451 820618
PDR ADOCK 05000302
G PDR

VIOLATION

Technical Specification 6.8.1 requires the following of procedures that cover the activities listed in Appendix A of Regulatory Guide 1.33, 1972.

Regulatory Guide 1.33, Appendix A, 1972 requires procedures for log entries and for operation of the shutdown cooling system.

Procedure AI-500, Conduct of Operations, requires adherence to the implementing procedures of the Operations Section Implementation Manual (OSIM). The OSIM, in Section III.E.2. A and B, requires log entries in the Nuclear Shift Supervisor's Log and the Nuclear Operator's Log for any unusual occurrences or unusual trends or conditions observed.

Procedure OP-404, Decay Heat Removal System (the facility's shutdown cooling system), requires the closure of the borated water storage tank suction valve (DHV-34) in paragraph 8.2.1.1 prior to starting the "A" decay heat train in paragraph 8.2.1.3.

Contrary to the above, the following events occurred due to failure to follow the OSIM and procedure OP-404:

- (1) On October 1, 1981 steam flashing in the hot legs of the reactor coolant system, an unusual occurrence and trend, was not logged in the Nuclear Shift Supervisor's Log nor in the Nuclear Operator's Log.
- (2) On November 6, 1981 at 2013, the "A" decay heat train was started without closing the borated water storage tank suction valve. (DHV-34)

Failure to close this valve resulted in the overflow of approximately 1650 gallons of reactor coolant system water into the reactor building.

RESPONSE

No response required.

VIOLATION

Technical Specification 6.11 requires procedures prepared to meet the requirements of 10 CFR, Part 20 be adhered to for all activities involving personnel radiation exposure.

Chemistry and Radiation Protection Procedure, RP-101, Section 4.8.2 requires:

- (1) An individual entering a contaminated area to wear proper clothing and devices necessary for contamination control.
- (2) Chem/Rad personnel are to be contacted to specify the clothing requirements for entering a contaminated area covered by a standing radiation work permit (SWRP). RP-101, Section 4.4 requires work to be conducted in a manner consistent with maintaining a minimum of contamination spread.

Contrary to the above, on December 1, 1981, at approximately 1350, a person was observed in a contaminated area, covered by an SRWP, without consulting Chem/Rad personnel for clothing requirements and without the proper clothing requirements that would have been specified for the area. In addition, this person was observed leaving the contaminated area with a bundle of contaminated rope without proper contamination controls (rope not bagged and/or gloves worn) resulting in contamination of the individual's hands of approximately 1000 disintegrations per minute (DPM).

RESPONSE

FPC accepts this violation. The violation stems from the use of poor judgement and negligence by the contract electrician. The Health Physics Department investigated this violation and as a result, the contract electrician's employment was terminated. This was an isolated incident, and is not expected to recur.

DEVIATION

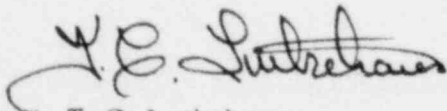
Final Safety Analysis Report (FSAR) Section 7.1.2.2.3 specifies that the total worst case error produced in the reactor outlet temperature trip channel, which includes sensor, processing equipment and trip bistable errors, will not exceed $\pm 1.00^{\circ}\text{F}$.

Contrary to the above, the procedure used to calibrate the reactor outlet temperature trip channel allows acceptance of a total error of $\pm 3.065^{\circ}\text{F}$. This total includes a sensor error of $\pm 0.065^{\circ}\text{F}$, a process error of $\pm 2.5^{\circ}\text{F}$, and a bistable error of $\pm 0.5^{\circ}\text{F}$. In addition, the $\pm 3.065^{\circ}\text{F}$ does not include the readability error of the signal converter meter used to calibrate the process equipment.

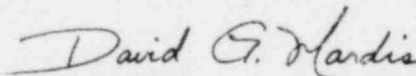
RESPONSE

After this problem was brought to the attention of FPC, a thorough investigation was conducted. The deviation occurred because a data sheet had been inadvertently deleted from the applicable surveillance procedure. An interim change was made to the procedure reinserting the required data sheet. This restricts the process error to the required $\pm 0.5^{\circ}\text{F}$. Surveillance was then performed. The Surveillance Procedure has been revised and now includes the data sheet which was inadvertently omitted.

Should there be further questions, please contact us.



T. C. Lutkehaus
Nuclear Plant Manager



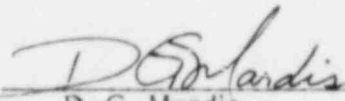
D. G. Mardis
Acting Manager, Nuclear Licensing

EWf/mlg

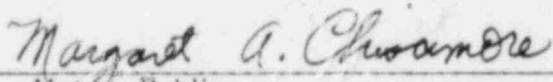
cc: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

STATE OF FLORIDA
COUNTY OF PINELLAS

D. G. Mardis states that he is the Acting Manager, Nuclear Licensing, of Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.


D. G. Mardis

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 28th day of May, 1982.


Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: May 29, 1984