



**Florida
Power**
CORPORATION

June 20, 1990

3F0690-18

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
Inspection Report 90-09

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the subject inspection report.

Should there be any questions, please contact this office.

Sincerely,

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

WLR:mag

Enclosure

xc: Regional Administrator, Region II
Senior Resident Inspector

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FLORIDA POWER CORPORATION
INSPECTION REPORT 90-09
REPLY TO NOTICE OF VIOLATION

VIOLATION 90-09-02

Technical Specification 6.8.1 requires the implementation of written procedures for those activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33 includes post modification testing procedures.

Contrary to the above:

On April 20, 1990, Post Modification procedure TP-1, MAR Functional Test for Reactor Building Fuel Handling Equipment Upgrade, was deficient in that the bridge and trolley index marks were not adequately tested to determine that the trolley index marks had been changed. This caused the first 2 fuel assemblies to be removed out of sequence.

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

FLORIDA POWER CORPORATION RESPONSE

Florida Power Corporation (FPC) accepts the violation. FPC also provides clarification to a statement made in reference to the violation that was contained in the Inspection Report. Section 7 of the Report makes reference to MAR (Modification Approval Record) Functional Test Procedure 87-12-10-01, TP-1. The Report states: "The bridge and trolley marks were checked in Step 7.3.3.49 of the procedure...". This is misleading because Section 7.3.3 of this procedure was not intended to verify the bridge and trolley index marks. This section was intended to verify the Fuel Assembly Mode Interlocks. This verification must be performed over the core to meet the necessary grapple elevation requirements. The core coordinate referenced in Step 7.3.3.49 is used as a convenient location to perform this verification. The Fuel Assembly Mode Interlocks Test is not dependent on the coordinates of the fuel grapple, only that it is over a fuel assembly in the core region.

APPARENT CAUSE OF VIOLATION

There was no intent for the modification to the fuel handling mechanism to change the indexing. The vendor who made the modification deviated from the original indexing letters. The FPC engineer did not review the drawings returned from the vendor for this type of change and, therefore, did not recognize the change. A review of the drawings with the vendor, after the violation was identified, revealed that the change was made on vendor drawings that were submitted for another purpose. Those drawings were submitted to show new video camera mounting details and were reviewed for that purpose. The index plate details were not shown on this drawing except that the beginning and ending indices, A, R, 1, and 15 were shown. The old indices were A, O, 1, and 15. Because this change was not intended or recognized, the MAR made no mention of replacement of the existing core Index Plates. The MAR Functional Test is performed to verify the equipment operates properly as intended by the modification. Since there was no intent to modify the indexing marks, verification of the indexing was not included in the MAR Functional Test.

CORRECTIVE ACTION

Temporary lettering was placed on the index plates to make them consistent with previous markings immediately following the discovery of the error. The permanent lettering was installed several days later.

DATE OF FULL COMPLIANCE

Full compliance was achieved on April 20, 1990.

ACTIONS TAKEN TO PREVENT RECURRENCE

The engineer involved in the incident was counselled. A memorandum will be issued to engineering personnel describing the incident and reinforcing the importance of assuring that all paperwork returned from vendors is verified prior to turning over the modification for testing.