



**Florida
Power**
CORPORATION

June 25, 1990
3F0690-19

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 90-15

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the deviation identified in the above inspection report.

If you have any questions regarding this subject, 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 90-15
REPLY TO NOTICE OF DEVIATION**

DEVIATION 90-15-01

In Florida Power Corporation submittal, "NUREG 0737, Supplement 1, Regulatory Guide 1.97", transmitted March 21, 1988, they committed to comply with Regulatory Guide (RG) 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident", unless specific exceptions were described.

One of the design criteria stipulated in RG 1.97 states: Types A, B, and C instruments designated as Categories 1 and 2 should be specifically identified with a common designation on the control panels so that the operator can easily discern that they are intended for use under accident conditions.

Contrary to the above, Crystal River 3 does not have the stipulated common designation of instruments on the control panels, and exception was not taken to this design criteria in any submittal. The March 21, 1988, submittal indicates the plant was in compliance with RG 1.97 at the time of the submittal.

FLORIDA POWER CORPORATION RESPONSE

APPARENT REASON FOR THE DEVIATION

Florida Power Corporation (FPC) has discussed, with the NRC, our position regarding symptom-oriented procedures and our desire not to have the stipulated common designation of instruments on the control panels. However, FPC did not take exception to this requirement when the submittal, describing FPC's conformance to RG 1.97, was made. As identified in the Inspection Report, the NRC has decided that specific identification of instruments is required at Crystal River Unit 3 and, as stated: "This applies to Category 1 variables only".

CORRECTIVE ACTION

FPC has completed marking the RG 1.97 Category 1 instruments on the Main Control Board. All Category 1 indicating lights are contained in the Engineered Safeguards (ES) matrix section of the Main Control Board. The ES matrix indicating lights are arranged in a unique array and have a unique color. All lights in the array are qualified to RG 1.97 requirements. The operators are trained to know the ES matrix indicating lights are qualified and are to be used under accident conditions. Since the ES matrix lights meet the intent of the Regulatory Guide (the operators can easily discern that they are intended to be used under accident conditions), no additional marking is required.

DATE OF FULL COMPLIANCE

Full compliance was achieved on June 22, 1990.

ACTIONS TAKEN TO PREVENT RECURRENCE

FPC normally documents exceptions to regulatory positions. The above deviation represents an isolated incident and no further corrective action is considered necessary.