

Florida Power

CORPORATION

Crystal River Unit 3
Docket No. 50-302

March 11, 1991

3F0391-03

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

Reference: NRC letter to FPC dated 9/8/86 - Notice of Violation - NRC
Inspection Report 86-20

FPC letter to NRC dated 10/8/86 - NRC Inspection Report 86-20
Original Response

FPC letter to NRC dated 2/23/87 - NRC Inspection Report 86-20
Revised Response

Dear Sir:

Florida Power Corporation (FPC) has identified the attached commitment as overly restrictive on routine plant activities. The commitment to Violation 86-20-01, Item b, states that only Maintenance personnel will perform valve packing adjustments on safety-related valves and that documentation will be required for the packing adjustment on manual valves.

The basis for stating only Maintenance personnel would perform packing adjustment was because no other personnel were provided training for the adjustment of packing leaks. FPC is now providing training to personnel from other departments (i.e., Operations) for valve packing adjustments. The individuals receiving this training are considered qualified to make these adjustments without affecting the performance of the valve.

The original violation was cited because a valve packing adjustment was made by Operations personnel on plant safety-related equipment without being documented on an approved work request. This was contrary to FPC procedures. FPC originally denied the violation in its response dated October 8, 1986 based on the position that routine adjustment of valve packing was not

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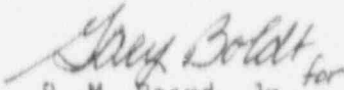
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considered a repair to equipment, and therefore, did not require documentation. The NRC Resident Inspector at that time would not accept this position and FPC revised its response on February 23, 1987. The revised response contained statements that would require documentation of the adjustment of valve packing on manual valves and allowed this type of adjustment to be done only by Maintenance personnel on safety-related valves.

A clarification of an additional statement within the violation response is also included. The words "safety-related" are added to the statement about the documentation requirements of valve packing adjustments to manual valves.

An evaluation in accordance with 10CFR50.59 has been performed on the above changes.

Sincerely,

A handwritten signature in cursive script that reads "Grey Boldt".

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

WLR:mag

Enclosure

xc: Regional Administrator, Region II
Project Manager, Region II
Senior Resident Inspector

FLORIDA POWER CORPORATION
REVISED RESPONSE
INSPECTION REPORT 86-20

VIOLATION 86-20-01

Technical Specification 6.8.1 requires the implementation of written procedures to cover those activities recommended in Appendix A of Regulatory Guide 1.33, November 1972 and the surveillance activities of safety related equipment.

Regulatory Guide 1.33, Appendix A, recommends procedures and/or written instructions for: the conduct of a plant startup, cold to hot; the operation of the emergency core cooling system; and performance of maintenance.

Procedure OP-202, Plant Heatup, step 6.4.7.15, requires the Decay Heat Removal system to be aligned for Engineered Safeguards (ES) operations in accordance with procedure OP-404, Decay Heat Removal System. Procedure OP-404, Valve Checklist III, requires valve DHV-111 to be in the throttled position.

Administrative Instruction AI-600, Conduct of Maintenance, step 4.4.12, requires that all nonemergency corrective maintenance on plant safety related equipment be authorized and documented by an approved Work Request (W/R).

Surveillance Procedure SP-201, Accessible/Inaccessible Hydraulic Snubbers Visual Inspection, revision 17, step 6.2.1, requires that if the reservoir sightglass fluid level is between 0-50 percent full, that the reservoir be refilled.

Contrary to the above:

- b. On April 8, 1986, procedure AI-600 was not implemented in that corrective maintenance, in the form of a valve packing adjustment, was performed on valve IAV-90 prior to authorizing and documenting this maintenance with an approved W/R.

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

RESPONSE

Florida Power Corporation's Position

Florida Power Corporation (FPC) agrees with the stated violation.

Apparent Cause of Violation

- b. As indicated in our initial response to the violation, FPC did not view the routine adjustment of packing on manual valves as a maintenance activity. FPC therefore did not implement the requirements of Reg. Guide 1.33 or ANSI N18.7 - 1976/ANS - 3.2 for this activity.

Corrective Actions

- b. A short term instruction was issued to Operations personnel directing operators not to adjust packing on safety related valves.

Date of Full Compliance

- b. Full compliance was achieved on December 12, 1986, with the issuance of a Short Term Instruction instructing operators not to perform any packing adjustments on safety-related valves.

Action Taken to Prevent Recurrence

- b. Plant procedures have been revised to require authorization and documentation of adjustment of valve packing on safety-related manual valves.

Only trained personnel will be allowed to adjust the valve packing on safety-related valves, except in emergencies.