



**Florida
Power**
CORPORATION

April 29, 1983
3F-0483-28

Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30303

SUBJECT: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 83-04

Dear Mr. O'Reilly:

Please find enclosed Florida Power Corporation's response to Inspection Report 83-04 dated March 23, 1983.

Sincerely,

G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

PGH/caw

Enclosure

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

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FLORIDA POWER CORPORATION RESPONSE
INSPECTION REPORT 83-04
April 22, 1983

VIOLATION

10 CFR 55, Appendix A, Paragraph 3.d, states that the requalification program shall include on-the-job training so that each licensed operator and senior operator reviews the contents of all abnormal and emergency procedures on a regularly scheduled basis. The licensee's submitted requalification training program (FSAR, Section 12D, Requalification Training Program, Florida Power Corporation, Crystal River Unit 3), Paragraphs 12D.1 and 12D.5.4 state that instructional sessions are conducted with such duration and frequency that information contained in abnormal and emergency procedures is covered annually. TDP 203, Licensed Operator Requalification Training Program, Revision 0, implements this requirement by having licensed personnel sign a quarterly shift procedure review sheet. These sheets contain a listing of abnormal and emergency procedures as well as other procedures deemed appropriate by the licensee for requalification purposes.

Contrary to the above, all licensed personnel are not reviewing the contents of all abnormal and emergency procedures on a regularly scheduled basis in that the listing of these procedures on the quarterly shift review sheets contained in TDP 203 is incomplete. Specifically, one emergency procedure (EP 114) and five abnormal procedures (AP 105, 121, 122, 123, and 124) are not contained on the quarterly shift review sheets and do not get reviewed on a regularly scheduled basis.

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

RESPONSE

- (1) FLORIDA POWER CORPORATION'S POSITION: All licensed personnel have not been reviewing the contents of all abnormal (AP) and emergency (EP) procedures on a regularly scheduled basis as required by 10 CFR 55, Appendix A, Paragraph 3.d.
- (2) DESIGNATION OF APPARENT CAUSE: This violation was caused by a procedure deficiency. Apparently when the review list in TDP-203 was drawn up, the five abnormal procedures and the emergency procedure listed in Inspection Report 83-04 were overlooked by personnel developing the procedure.
- (3) IMMEDIATE CORRECTIVE ACTIONS: The Plant Operating Quality Assurance Manual was reviewed to determine which abnormal and emergency procedures had been inadvertently overlooked in the licensed operator requalification training program. Following this review, a supplemental Procedure Review Sheet was issued to include the overlooked procedures.
- (4) LONG TERM CORRECTIVE ACTIONS: The Procedure Review Listing in TDP-203 (reference (h) of the Inspection Report) will be revised by June 1, 1983 to include the overlooked procedures. As new abnormal and emergency procedures are approved, the new procedures are sent to the Training Department per Document Control/Records Management Procedure 7. To prevent a recurrence of this violation, personnel have been instructed to update the Procedure Review List when a new AP or EP is issued.
- (5) DATE OF FULL COMPLIANCE: Florida Power Corporation will be in full compliance on June 1, 1983.