



# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302

October 3, 1994  
3F1094-01

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

Subject: Notice of Violation  
NRC Inspection Report No. 50-302/94-19

Reference: NRC to FPC letter, 3N0994-03, dated September 8, 1994

Dear Sir:

Florida Power Corporation (FPC) provides the attached as our response to the subject Notice of Violation.

Sincerely,

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

PMB/EEF:ff

cc: Regional Administrator, Region II  
NRR Project Manager  
Senior Resident Inspector

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A Florida Progress Company

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FLORIDA POWER CORPORATION  
NRC INSPECTION REPORT NO. 50-302/94-19  
REPLY TO A NOTICE OF VIOLATION

VIOLATION 50-302/94-19-01

The licensee's Quality Program, as outlined in the Management Control Manual, Sections MCE V-1 through V-3, in part, requires that measures shall be established to ensure that appropriate controls are applied to quality-related activities associated with ATWS equipment. These measures may include plant procedures. Additionally, licensee procedure AI-500, "Conduct of Operations", section 4.4.7.2 requires that when a malfunctioning annunciator is placed out-of-service, a maintenance deficiency sticker shall be placed on the annunciator window/link, as appropriate, and a work request initiated.

Contrary to the above, in May 1994, the licensee failed to appropriately maintain procedures pertaining to ATWS, as required by the Management Control Manual, for the ATWS Mitigating System Actuation Circuitry (AMSAC). Following completion of a modification MAR 93-06-16-01 to the ATWS - AMSAC, the licensee did not revise procedure SP-120B, "ATWS - AMSAC Functional Test", to reflect the modification prior to the procedure being performed, resulting in a loss of appropriate controls for this quality-related activity. The setpoint values in the old revision to the procedure were nonconservative, bypassing the system at a higher level than designed.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The reason for the violation was personnel error on the part of the FPC Systems Engineering personnel for failure to properly identify all procedures requiring revision coincident with the installation of a plant modification.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

On July 7, 1994, the bistable module setpoints were returned to their correct values. SP-120B was revised by System Engineering and re-performed, verifying the setpoints had been adjusted correctly. A standardized Modification Approval Record (MAR) and Field Change Notice (FCN) review program has been included in the System Engineering Manual. This also includes the results of an evaluation on the use of computer based aids in the performance of the MAR/FCN review program.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A Human Performance Evaluation System (HPES) study identified an additional corrective action, which FPC will act on, to review and enhance the MAR process. Namely, for procedures requiring revision, the procedure issuance due dates will be more accurately identified. In addition, FPC's Quality Programs Department will evaluate the process each department uses when reviewing MAR/FCN impact on procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by December 31, 1994.

VIOLATION 50-302/94-19-02

The licensee's Quality Program, as outlined in the Management Control Manual, Sections MCE V-1 through V-3, in part, requires that measures shall be established to ensure that appropriate controls are applied to quality-related activities associated with ATWS equipment. These measures may include plant procedures. Additionally, licensee procedure AI-500, "Conduct of Operations", section 4.4.7.2 requires that when a malfunctioning annunciator is placed out-of-service, a maintenance deficiency sticker shall be placed on the annunciator window/link, as appropriate, and a work request initiated.

Contrary to the above, on July 1, 1994, licensee technicians failed to follow procedure SP-120B when calibrating ATWS - AMSAC setpoints. This allowed the improper setpoints on the ATWS - AMSAC system to remain unidentified, resulting in the AMSAC Low Flux Bypass being adjusted in a nonconservative manner and AMSAC being unable to perform its design function, for a period of approximately five days.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The reason for the violation was personnel error on the part of the FPC I&C technicians for the failure to question inconsistencies and unexpected results of procedure steps.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The I&C technicians involved have been disqualified on the performance of the ATWS system procedures and maintenance of the system pending appropriate retraining.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

All I&C technicians will undergo "STAR Training"(a philosophical discussion of Stop/ Think about what you are about to do/ Act on what you were to do/ and then Review what you did to see if you got the results expected) to enhance the development of a more questioning attitude. Formal retraining on the ATWS system will be provided for the I&C technicians involved in this event.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by December 31, 1994.

VIOLATION 50-302/94-19-03

The licensee's Quality Program, as outlined in the Management Control Manual, Sections MCE V-1 through V-3, in part, requires that measures shall be established to ensure that appropriate controls are applied to quality-related activities associated with ATWS equipment. These measures may include plant procedures. Additionally, licensee procedure AI-500, "Conduct of Operations", section 4.4.7.2 requires that when a malfunctioning annunciator is placed out-of-service, a maintenance deficiency sticker shall be placed on the annunciator window/link, as appropriate, and a work request initiated.

Contrary to the above, on July 1, 1994, the licensee failed to follow procedure AI-500 when disabling an alarming annunciator indicative of AMSAC malfunction. The link on the annunciator was opened, removing indication of the malfunction, without placing a deficiency sticker and without initiating a work request. No corrective actions were initiated to deal with this malfunction until July 4, 1994.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The reason for the violation was personnel error on the part of FPC Operations personnel. The cause for the delay in issuing the work request and placing a deficiency sticker is attributed to the fact that Operations personnel assumed that the I&C technicians would complete the system restoration using the surveillance procedure. Operators felt this was not a malfunctioning alarm, but was a valid alarm that became a nuisance due to an incorrectly set bistable under the control of a plant surveillance procedure. Work requests are not written to track or perform surveillance procedures.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Corrective actions included providing this experience to all of the operations department in an Operations Study Book entry.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The procedure addressing the Annunciator/Event Point Alarm Defeat Log will be reviewed to determine if clarification of the actions to be initiated with each log entry is required. To correct the identified weakness of little guidance for what is required/necessary in order to remove ATWS systems and other important non-safety related systems from service, Operations is developing a list of such non-safety systems. For the systems on this list, Operations personnel will be provided with a condition, required actions, and recommended completion times, as appropriate, such that they can evaluate and track the deficiencies.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by November 30, 1994.