



USNRC REGION II
ATLANTA, GEORGIA

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**Florida
Power**
CORPORATION

July 29, 1983
3F-0783-26

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. 83-09, Supplement 1

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report. This report supplements our initial report dated June 16, 1983.

Sincerely,

W. S. Wilgus
Vice President
Nuclear Operations

Attachment

AEF:mm

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PDR ADOCK 05000302
Q PDR

INSPECTION REPORT 83-09
SUPPLEMENT I
JULY 26, 1983

VIOLATION

Technical Specification 4.0.5b requires inservice testing of ASME Code Class 1, 2, and 3 pumps and valves in accordance with Section XI of the ASME Boiler and Pressure Vessel Code 1974 Edition and Addenda through Summer 1975.

The 1974 Edition of Section XI requires in Article IWP-4113, Calibration, that all instruments used for testing be calibrated and be verified for proper calibration on a regular basis established by the licensee.

Contrary to the above, as of March 10, 1983, 47 of 65 instruments used to perform inservice testing of pumps were found to be out of calibration. In addition, there is no established program to verify proper calibration on a regular basis.

This is a Severity Level IV Violation.

RESPONSE

- (1) FLORIDA POWER CORPORATION'S POSITION: In the subject report Mr. Stetka of your office indicated that as of March 10, 1983, 47 of 65 instruments identified in Surveillance Procedures SP-340, 344, and 349 required to perform inservice testing of pumps, were out of calibration. Furthermore, he indicated that there is no established program to verify proper calibration on a regular basis.

Florida Power Corporation (FPC) did fail to systematically calibrate some of the instrumentation used for inservice testing of ASME Class 1, 2, and 3 pumps. However, a review by FPC of the Surveillance Procedures investigated by your staff (SP-340, 344, and 349) identified only 27 instruments required to be calibrated by ASME Boiler and Pressure Vessel Code, Section XI, Article IWP-4113. Of the 27, 22 had exceeded their calibration intervals as follows:

<u>No. of Instruments</u>	<u>Year Due for Calibration</u>
4	1979
0	1980
11	1981
7	1982

In addition to Surveillance Procedures 340, 344, and 349, SP 320 and 334 were also reviewed to include all procedures required for inservice testing of pumps. The review by FPC of all applicable Inservice Testing (IST) procedures identified a total of 38 instruments required to be calibrated by Article IWP-4113 of Section XI (ASME Boiler and Pressure Vessel Code). Of these 38 instruments, 28 had exceeded their calibration interval and 3 were actually out of calibration.

Additionally, a review of all plant Surveillance Procedures identified about 1270 instruments (including IST related) that are used to perform surveillances. Approximately 466 of the 1270 SP-related instruments had exceeded their calibration interval. Moreover, 380 SP-related instruments were found to have undefined calibration frequencies. A total of 204 SP-related instruments were found to be out of calibration.

It should be noted that the instrumentation used to perform Surveillance Procedures consists of the following categories:

1. All safety-related instrumentation.
2. All IST related instrumentation.
3. All Technical Specification related instrumentation.
4. Some balance-of-plant instrumentation.

However, only categories 1, 2, and 3 are required to be calibrated.

At the time of inspection, Florida Power Corporation did have a computer program that stored instrument calibration information; however, Florida Power Corporation did fail to adequately update and maintain the data base.

- (2) DESIGNATION OF APPARENT CAUSE: The failure of Florida Power Corporation to systematically calibrate some instrumentation was due to:

A. Failure of personnel to

1. Identify many of the instruments required to be calibrated.
2. Adequately manage the existing instrument calibration program.
3. Establish realistic instrument calibration frequencies coupled with appropriate manpower levels to carry out the program.

B. Involvement of multiple departments in maintaining and updating the Instrument List which probably resulted in confusion and some loss of data.

C. Utilization of a cumbersome and outdated computer program to maintain the Instrument List which resulted in delays and errors in recording instrument calibrations.

- (3) IMMEDIATE CORRECTIVE ACTIONS: The corrective action taken by Florida Power Corporation is indicated below:

A. Contract Personnel were hired to:

1. Classify instruments to an appropriate class:
 - a. Safety-related.
 - b. Used in Performance of Surveillance Procedures (including IST instruments).
 - c. Balance of Plant.
 - d. Inactive and are not installed.
2. Specify appropriate calibration frequencies.
3. Develop administrative controls which will define grace periods and required action to ensure that calibration frequencies are met.
4. Develop and assist in the implementation of a user-friendly computerized instrument calibration recall system.

- B. Additional contract Instrument and Control (I&C) technicians were hired to assist existing I&C Shop personnel to calibrate the IST related, safety-related and SP-related instrumentation that had exceeded their calibration intervals.
- C. Conduct a review to identify any additional instruments that should be calibrated prior to restart.
- D. Review all systems subject to inservice inspection per Section XI of the ASME Boiler Pressure Vessel Code to verify that they are operational prior to restart.

The results achieved thus far by the previously listed corrective action are listed below:

- A. Instruments required to be calibrated have been assigned to appropriate classes (a or b) and appropriate calibration frequencies have been specified.
 - B. Administrative Controls which define grace periods and required action to ensure that calibration frequencies are met have been developed.
 - C. The review to identify additional instruments that should be calibrated prior to restart has been completed.
 - D. All of the instruments identified in the violation have been calibrated.
 - E. All systems subject to inservice tests per Section XI of the ASME Boiler and Pressure Vessel Code have been verified to be operable with properly calibrated instruments prior to restart.
- (4) FUTURE CORRECTIVE ACTIONS: Florida Power Corporation will evaluate all systems which are subject to Inservice Inspection per Section XI of the ASME Boiler and Pressure Vessel Code to determine if any were incorrectly determined to be operable due to instruments that were out of calibration during previous testing. A user-friendly computerized instrument calibration recall system has been developed and should be implemented by September 1, 1983.
- (5) DATE OF FULL COMPLIANCE: All IST related, Tech Spec related, and safety-related instrumentation that had exceeded their calibration interval will be calibrated prior to start-up for Cycle 5.