

USNRC REGION II
ATLANTA, GEORGIA

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**Florida
Power**
CORPORATION

September 9, 1983
3F-0983-08

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. 83-13

Dear Mr. O'Reilly:

Florida Power Corporation (FPC) provides the attached as our response to the subject inspection report.

In a letter (3F-0783-12) dated July 13, 1983, FPC committed to (Item 2) "develop (by October 1, 1983) an acceptable method of dose assessment to be used by Operators which can be performed such that protective action guides can be recommended within the first 15 minutes of an accident."

In a phone conversation between Mr. E. K. Neuschaefer (FPC) and Mr. G. Huffman (NRC) on Tuesday, September 6, 1983, FPC stated that an additional month will be needed to complete the procedure revisions. In way of explanation and as detailed in the attachment, this time is needed in order to perform a full evaluation and allow adequate time for preparation and review of procedures.

The interim measure of reviewing the existing procedure with all on-shift operators and having them demonstrate the ability to perform rapid dose assessment within 15 minutes will be completed by September 30, 1983.

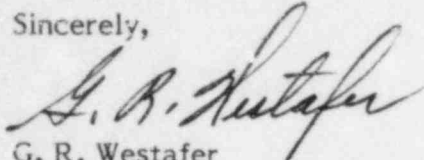
FPC considers this to be an adequate interim control until the procedure is revised.

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Should there be any questions concerning this information, please contact this office.

Sincerely,



G. R. Westafer
Manager Nuclear Operations
Licensing and Fuel Management

Attachment

AEF/feb

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

FLORIDA POWER CORPORATION
INSPECTION REPORT NO. 83-13
September 9, 1983

A. VIOLATION

Technical Specification 6.8.1 requires the licensee to establish emergency procedures which implement the emergency plan. Section 14.3, "Offsite Protective Measures" of the Crystal River Radiological Emergency Response Plan states, "FPC shall make prompt notification (within approximately 15 minutes) directly to offsite authorities responsible for implementing protective measures." In cases involving offsite releases of radioactive materials, an offsite dose assessment is required in order to formulate protective action recommendation to offsite authorities as required by EM-207, "Reporting Requirements for Emergencies".

Contrary to the above, the "Initial Assessment" portion of EM-204, "Release and Off-site Dose Assessment during Radiological Emergencies at CR-3" was inadequate in that, on six separate walk-thrus between June 27 and July 1, 1983, the individuals assigned the responsibility for implementing the procedure required 30 to 45 minutes to complete the procedure and therefore failed to demonstrate a capability for prompt notification including protective action recommendations.

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

A. RESPONSE

- (1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation (FPC) agrees that the operations personnel questioned failed to demonstrate a capability for prompt initial dose assessment and protective action recommendations within the required fifteen (15) minutes.
- (2) DESIGNATION OF APPARENT CAUSE: It has been determined that the cumbersome procedure for dose assessment (EM-204) was the cause for the excessive completion time. It is also believed that lack of frequent training and review of EM-204, "Release and Off-site Dose Assessment During Radiological Emergencies at CR-3" caused the operators to be unfamiliar with the procedure.
- (3) IMMEDIATE CORRECTIVE ACTIONS: FPC has contacted other utilities and the Institute of Nuclear Power Operation and requested they send their rapid dose assessment procedures which will be used as guidelines. To reduce the size of the procedure, EM-204 will be divided into three separate procedures, one for the computer method, one for the manual method, and one for the initial rapid assessment method which the operators utilize. By reducing the size of the overall procedure and modifying it using the guidelines mentioned above, EM-204 will be a shorter and simpler procedure. EM-204 will be revised by November 1, 1983.

Beginning immediately, a representative from the Nuclear Operations Training Department will review EM-204 with all "on shift" licensed operators and Operations Technical Advisors (OTA's). All "on shift" licensed operators and OTA's will be required to demonstrate the ability to perform the rapid dose assessment procedure within fifteen (15) minutes. This review and demonstration will be completed by September 30, 1983.

- (4) LONG TERM CORRECTIVE ACTIONS: At the time the EM-204 revision is issued, training on the new procedure will be provided to all licensed operators. To avoid further violations, the EM-204 revision will be placed in the existing quarterly procedure review book which will ensure that all licensed operators will review and sign off EM-204 on a quarterly basis. The training and the placement of EM-204 into the quarterly procedure review book will be complete by December 31, 1983.
- (5) DATE OF FULL COMPLIANCE: Full compliance will be achieved by December 31, 1983.