Florida
Power
CORPORATION
Crystal River Unit 3
Docket No. 50-302

January 18, 1995
3F0195-08

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

Subject: Notice of Violation
NRC Inspection Report No. 50-302/94-25

Reference: NRC to FPC letter, 3N1294-14, dated December 20, 1994

Dear Sir:

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

Sincerely,

Gary Boldt

G. L. Boldt
Vice President
Nuclear Production

GLB/RLM

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

IE01
1/1

FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/94-25
REPLY TO A NOTICE OF VIOLATION

VIOLATION 50-302/94-25-01

Technical Specification 5.6.1.1 states that written procedures shall be established, implemented, and maintained covering activities as recommended in Regulatory Guide 1.33, Rev. 2, Appendix A, February 1978. Regulatory Guide 1.33, Appendix A recommends procedures regarding control room heating and ventilation.

Compliance Procedure CP-137, Breach Authorization Program, Section 3.1.2, Control Complex Habitability Envelope Breaches, states in paragraph 3.1.2.3 Multiple breaches in the envelope may exist but no penetration may be left unattended without a temporary seal. A Control Complex Habitability Envelope penetration breach may be open while work is being performed provided there is communications with the Control Room so that in the event of a toxic gas monitor alarm instructions can be immediately given to the workmen to seal the breach.

Contrary to the above, on November 14, 1994, at 9:20 a.m. the upper door to the Control Complex was found blocked open with no temporary seal and with no communications established with the Control Room. This condition had existed periodically for approximately two weeks. The Control Complex habitability envelope was breached thereby resulting in bypassing the design for safe occupancy of the control room during abnormal conditions.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The primary cause of this event was that certain FPC and contractor personnel involved in the roofing repair project failed to recognize the requirement to maintain the integrity of the control complex habitability envelope.

A secondary cause of this event is related to the corrective action from a somewhat similar event as previously reported in LER 90-007-00. This corrective action required postings on Control Complex boundary doors. The instructions provided on these postings were directed toward repair work on the doors themselves and were not generic enough for this particular set of circumstances.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Immediate corrective action was to re-establish the integrity of the control complex habitability envelope. Additionally, a maintenance study book entry and an operations manager journal entry were generated to inform maintenance and operations personnel of the event. The present signs have been replaced with human factored signs which eliminate any ambiguity relative to actions to be taken when work activities affect the doors.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Additional training will be conducted for applicable personnel to ensure that the requirements and actions relative to the control complex habitability envelope are understood.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The additional training has commenced and will be completed by September 1, 1995.

VIOLATION 50-302/94-25-02

Technical Specification 3.8.1 requires that in Modes 1, 2, 3, and 4, two emergency diesel generators (EDGs), each capable of supplying one train of the onsite Class 1E AC Electrical Power Distribution System, shall be OPERABLE. With one EDG inoperable, operation may continue provided that Surveillance Requirement (SR) 3.8.1.1 shall be completed within one hour and at least once per eight hours thereafter. SR 3.8.1.1 requires that correct breaker alignment and indicated power availability for each required offsite circuit shall be verified.

Contrary to the above, on October 11, 1994, the A EDG was rendered inoperable during the performance of licensee procedure SP-907A,, Monthly Functional Test of A 4160V Engineered Safeguards Bus Undervoltage Relaying, and the requirements of SR 3.8.1.1 were not performed and documented.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The cause was inattention to detail coupled with poor communication and teamwork between licensed control room operators. The "Operations Plan for Enhancement of Team Performance" lists the following "tools" available to control room personnel: knowledge, procedure adherence, questioning attitude, effective communications, and pre-job briefing. In this instance, the tools not properly utilized were knowledge and effective communications. The Assistant Nuclear Shift Supervisor (ANSS) and control board operators held a pre-job briefing prior to performance of the Monthly Functional Test Procedure (SP-907A), however they incorrectly interpreted the procedure requirements. They stated that they did in fact perform the required verification of offsite breaker alignment and power availability, but did not document the data. Therefore, the surveillance must be considered "not performed". Had effective communication existed between the Shift Supervisor on Duty (SSOD) and the ANSS, the SSOD would have recognized the erroneous conclusion and the requirement to complete the Power Distribution Breaker Alignment And Power Availability Verification Surveillance procedure (SP-321).

A contributing factor to this event was that SP-907A was not human factored for ease and unambiguity of interpretation. Only acronyms were used in the text and TS references were listed by number without titles. Had the procedure been less confusing, the operators would have had the knowledge to make the correct decision.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A review was performed to ensure full compliance with the TS and the requirements of SP-321. The SSOD and ANSS have made a presentation to the Manager, Nuclear Plant Operations. This presentation addressed the attention to detail, communication and teamwork skills improved since the occurrence of this event. The Monthly Functional Test of 4160 volt Engineered Safeguards Bus Undervoltage Relaying procedures for both "A" and "B" channels has been revised for human factors problems to ensure correct interpretation of the required surveillances to be performed following the declaration of the EGDGs as inoperable.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A new "Event-Free Operations" program is being implemented, expanding the concept of human performance tools by focusing on both worker and management use of such tools.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The new program will commence prior to January 31, 1995.