



**Florida
Power**
CORPORATION

January 3, 1984
3F0184-03

Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection and 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
IF Inspection Report No. 83-27

Dear Mr. O'Reilly:

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

Sincerely,

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

AEF/feb

Attachment

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 83-27

A. VIOLATION

Technical Specification 4.4.6.2.1d requires the determination of Reactor Coolant System (RCS) leakage at least once per 72 hours during steady state operation while the plant is in operational modes 1 through 4.

Contrary to the above, during the time period from 6:00 a.m. on October 17 until 9:30 p.m. on October 21, no leakage determination was made.

This is a Severity Level IV Violation (Supplement 1).

A. RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation agrees that, during the time period mentioned in the violation, no Reactor Coolant System leakage determination was made. However, we take exception to the statement made in the body of the inspection report that "No consideration was given the steady state plateaus during the power reduction." In fact, Surveillance Procedure SP-317, RCS Water Inventory, was addressed at the time of its next scheduled performance. However, non-steady state plant conditions (transient xenon conditions) existed that prevented performance of the RCS leakage determination. Nevertheless, when steady state conditions were once again achieved, the surveillance was not rescheduled and performed.

(2) Designation of Apparent Cause:

As stated in the observation for the finding, Surveillance Procedure SP-317, RCS Water Inventory, is completed on Mondays, Wednesdays, and Fridays. During the time frame noted in the violation, SP-317 was performed satisfactorily on Monday, October 17, 1983. Although power was steady at 9% during the time that SP-317 is normally performed, xenon concentration was in a transient condition in the reactor. This forces the operator to change make-up tank levels for boration and deboration and manually control T_{ave} with the control rods. At the time of the determination that the plant was in a non-steady state condition, a notation should have been made in Surveillance Procedure SP-443, Master Surveillance Plan, to do SP-317 as soon as the plant was in a steady state condition. Lack of this notation resulted in not conveying, to the following shifts, the need to perform SP-317 as soon as the plant was stable. When xenon reached equilibrium conditions (an essential aspect of how FPC defines steady state conditions), SP-317 should have been performed.

(3) Immediate Corrective Action:

Shift Supervisors have been reminded of the necessity to carry forward any outstanding Technical Specification required surveillance that cannot be performed as originally scheduled due to current plant conditions.

(4) Long Term Corrective Action:

An automated surveillance tracking and scheduling program has been developed for CR-3. This is intended to enable appropriate personnel to check on each shift for surveillances not completed up to that time. The surveillance will show up as due until it has been completed satisfactorily.

(5) Date of Full Compliance:

FPC was in full compliance on October 21, 1983 when the RCS leakage determination was satisfactorily completed. The system discussed in the Long Term Corrective Action is anticipated to be in operation by March 1, 1984, at which time the computer terminal for the automated surveillance tracking system is expected to be installed and operable in the Control Room.

B. VIOLATION

Technical Specification (TS) 6.8.2 requires each procedure delineated in TS 6.8.1 and Regulatory Guide 1.33, 1972 to be reviewed by qualified intradepartmental and interdisciplinary reviewers and approved by the responsible Superintendent or Manager prior to implementation. Regulatory Guide 1.33 requires such procedures for the operation of the control rod drive system and the plant heating and ventilation systems.

Contrary to the above:

1. On October 13, the control rod drive system was operated with a vendor supplied procedure that was not reviewed by a qualified reviewer and approved by the responsible Superintendent or Manager prior to implementation.
2. On October 27, the plant heating and ventilation system was operated with a "Short Term Instruction" that was not reviewed by a qualified interdisciplinary reviewer prior to implementation.

This is a Severity Level V Violation (Supplement 1).

B. RESPONSE - ITEM 1

(1) Florida Power Corporation's Position:

Florida Power Corporation concurs with the apparent violation.

(2) Designation of Apparent Cause:

The cause was attributed to an inadequate Operating Procedure, OP-502, Control Rod Drive System. This procedure does not provide specific guidelines for freeing jammed control rods.

(3) Immediate Corrective Action:

Applicable portions of the CRDM Service Tip No. 4-79, Procedure to Free Jammed Control Rod Drive Mechanism - Type A, will be included and referenced in OP-502. OP-502 is reviewed and approved in accordance with the requirements of Technical Specification 6.8.2.

(4) Long Term Corrective Action:

The short term corrective action taken is sufficient to preclude recurrence.

(5) Date of Full Compliance:

OP-502 will be revised by February 15, 1984.

B. RESPONSE - ITEM 2

(1) Florida Power Corporation's Position:

Florida Power Corporation agrees that Short Term Instruction (STI) 83-100 was written to change performance of an activity that should have been accomplished through a procedure change.

(2) Designation of Apparent Cause:

The Short Term Instruction was intended to clarify, for operations personnel, how to accommodate change out of Fire Damper #51. The issuance of STI 83-100, instead of writing an Immediate Temporary Change to Procedure OP-409, Plant Ventilation Systems, was an error.

(3) Immediate Corrective Action:

An Immediate Temporary Change (ITC) was issued to OP-409 to reflect the contents of the Short Term Instruction documenting approval for operation of the control complex fans in the recirculation mode to accommodate change out of Fire Damper #51.

(4) Long Term Corrective Action:

A change has been initiated to Section III.F, "Short-Term Instructions", of the Operations Section Implementation Manual (OSIM). This change will reinforce that Short Term Instructions shall not be issued or used as a substitute for a properly approved procedure change. This OSIM change was completed by December 27, 1983.

(5) Date of Full Compliance:

Date of full compliance was achieved on December 27, 1983 with the issuance of the ITC.