



**Florida
Power**
CORPORATION

January 27, 1984
3F0184-25

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
IE Inspection Report No. 83-29

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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PDR ADCK 05000302
Q PDR

(2) DESIGNATION OF APPARENT CAUSE:

1. The individual performing this valve lineup apparently failed to note the performance of this step (DJV-54). The lineup was accomplished, in sequence, with one documentation error.
2. The cause of the operator taking the pump vibration in a vertical direction instead of a horizontal direction as required by procedure was due to a combination of operator error and procedural inadequacy.
3. The operator performing the procedure believed the sight glass had been approved for use and failed to follow step 6.1.1.1 of SP-349 to use casing scribe marks.
4. The root cause of this occurrence is procedural inadequacy. As stated in the discussion for this violation, although the operator successfully completed section 6.0, he failed to initial it. This procedure is separated into two "sub-sections". Subsection 'B' was being performed and because section 6.0 is located prior to subsection 'A' and not 'B', the required sign-offs were also overlooked by supervisory personnel during their review.
5. Most flow rates on liquid releases are at 100 gpm. This particular release was more restrictive and the operator failed to correctly set the flow controller for WDV-91.

(3) CORRECTIVE ACTION:

1. Upon discovery that DJV-54 had not been initialed, another operator verified its closed position.
2. SP-349 has been changed to state in the body of the procedure the direction in which each reading is to be taken and requires a signoff by the person performing the procedure. Prior to this change, the direction was indicated only on the data sheet.
3. A new installed sightglass is now operable and available for such surveillances. Procedures have been modified to more clearly indicate acceptance criteria.
4. SP-349 has been changed to require a sign-off, prior to performing subsection 'B', to assure section 6.0 has been completed and not overlooked.
5. The incident has been documented and the operator has been counseled. OP-407-A has been changed to require the "maximum allowable flow rate" and "what the flow rate is" to be stated in the body of the procedure. This ensures the operator is aware of any special off-routine flow rate restrictions and to document the adherence to whatever flow rate is permitted.

(4) CORRECTIVE ACTION TO PREVENT RECURRENCE:

The corrective actions listed above are considered adequate to prevent recurrence of this specific items. However, these items heightened management awareness regarding an opportunity to improve in this general area. In addition to our ongoing procedure review/upgrade efforts, we are increasing supervisory involvement and taking steps to increase inter-departmental review of surveillance procedures. The overall program(s) to improve human factors aspects and increasing awareness of standing management policy on procedural adherence should also lead to improved performance.

(5) DATE OF FULL COMPLIANCE:

FPC has completed the corrective actions listed in Section 3 above and considers these particular items resolved. The actions to prevent recurrence are part of our overall commitment to excellence in this area and, as such, has no completion date.

FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 83-29

VIOLATION

Technical Specification 6.8.1.c and 6.11 requires adherence to procedures involving surveillance, and test activities and those required by 10 CFR 20. Surveillance procedures SP-354 and SP-349 provide surveillance and test activities of the "A" emergency diesel generator (EDG A) and emergency feedwater pumps (EFP-1 and EFP-2), respectively. Operating Procedure OP-407-A provides the procedure for performing radioactive liquid releases and requires adherence to the Liquid Radwaste Release Permit (LRWRP).

Contrary to the above:

- (1) On November 9, 1983, procedure SP-354 was not adhered to in that the prerequisite of step 6.1.2, which required completion of the valve check lists, was not completed prior to EDG operation.
- (2) On November 9, 1983, procedure SP-349 was not adhered to in that the horizontal vibration readings required by step 6.2.4 and data sheet 1A were not taken.
- (3) On November 22, 1983, procedure SP-349 was not adhered to in that the turbine bearing oil levels were not within the turbine casing scribe as required by step 6.1.1.1 prior to EFP-2 operation. In addition, the oil levels were verified using newly installed, unapproved sight glasses instead of casing scribe marks as required by steps 6.1.1.1 and 6.1.1.2.
- (4) On November 23, 1983, procedure SP-349 was not adhered to in that the preliminary actions required in section 6.0 were not initialed prior to EFP-2 operation. In addition, this completed data was reviewed and approved as correct by first line supervision without recognizing the failure to complete section 6.0.
- (5) On November 24, 1983, procedure OP-407-A was not adhered to in that the requirement of step 3.3.8 to release a tank at the flow rate specified on the LRWRP was not met and the tank was released at greater than twice the specified limit.

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

RESPONSE

(1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporation concurs with the above stated violation on failure to follow procedures.