



USNRC REGION II  
ATLANTA, GEORGIA

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**Florida  
Power**  
CORPORATION

November 30, 1983  
3F1183-25

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. 83-18

Dear Mr. O'Reilly:

Enclosed is Florida Power Corporation's (FPC's) supplemental response to Inspection Report 83-18, dated August 22, 1983.

Florida Power had discovered that several drawings, as discussed in our letter of August 4, 1983, contained various minor deficiencies. While drawings were, in fact, redrawn after incorporating modifications and information obtained through plant walkdowns, the information incorporated was not as totally accurate as anticipated. Actions to correct the identified drawing errors to date will be complete by January 31, 1984. Any additional drawing deficiencies identified by our review of the Reactor Building Leak Rate Testing, Reactor Coolant, Makeup and Purification, and Core Flood Systems will be corrected by September 17, 1984.

Sincerely,

*P. Y. Baynard*  
P. Y. Baynard  
Assistant to Vice President  
Nuclear Operations

Attachment

RMB/feb

cc: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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FLORIDA POWER CORPORATION  
RESPONSE  
INSPECTION REPORT 83-18, SUPPLEMENT  
November 30, 1983

A. VIOLATION

10CFR Part 50, Appendix B, Criterion 16 requires corrective action measures that assure that nonconformances are promptly identified and corrected and that such measures will prevent repetition of these nonconformances.

Section 1.7.1.16 of Florida Power Corporation's (FPC) Quality Program requires nonconformances to be promptly identified and corrected and that the corrective action taken be sufficient to prevent recurrence of the nonconformance.

Letters to the Nuclear Regulatory Commission from FPC, dated September 24 and November 2, 1982, responded to the violations identified in NRC Inspection 50-302/82-11 and stated that the corrective actions involving revisions to procedure valve line-ups would be completed by November 9, 1982. This response also stated that recurrence of this event would be prevented by instructing personnel to give greater attention to valve line-ups during periodic procedure reviews.

Contrary to the above, as of July 29, 1983, two operating procedure and two surveillance procedure valve line-ups covering five safety-related plant systems were found to have missing or incorrectly identified valves for three of the five systems. Some of the missing valves have existed since the issuance of the violation in NRC Inspection Report 50-302/82-11.

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

A. RESPONSE

- (1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation agrees that the four procedures (OP-404 and 405 and SP-354-A and B) had missing or incorrectly identified valves. One of the valves cited as being missing, DJV-34, was correctly listed on the valve line-up for EDG-B.
- (2) DESIGNATION OF APPARENT CAUSE: This violation was caused by inadequate procedure reviews. In most of the cases cited, it appears that this inadequacy was due to a misunderstanding as to which valves are required to be included in a valve line-up check list.

On September 24 and November 2, 1982, Florida Power Corporation committed "to correct the cited deficiencies". Several instances identified, however, were not considered to be deficiencies. Because DHV-117 is an instrument root valve that is difficult to reach, responsible personnel did not consider the inclusion of this valve in a valve line-up checklist necessary. Thus, DHV-117 was not included in a valve line-up checklist by November 9, 1982.

To prevent recurrence of the procedural violation identified in Inspection Report 82-11, Florida Power committed to instruct review personnel "to give greater attention to assure that valve line-ups are indeed correct". This instruction, however, did not address which types of valves must be included in valve line-up checklist. Thus, while some reviewers include all valves in a particular valve line-up, another reviewer might not include inaccessible valves, instrument root valves, seldom operated valves, or other non-essential valves. This is apparently why the identified valves (with the exception of DJV-34) were incorrectly identified or not included in valve line-up checklists.

- (3) IMMEDIATE CORRECTIVE ACTIONS: Florida Power Corporation has revised OP-404 and 405 and SP-354-A and B to include all of the cited omissions.

In addition, Florida Power Corporation has performed or will perform a plant walkdown comparing actual plant configuration to the flow diagrams on the following safety-related systems:

- (a) Decay Heat Removal
- (b) Building Spray
- (c) Emergency Diesel Generator (A and B)
- (d) Fire Service
- (e) Spent Fuel
- (f) Decay Heat Closed Cycle Cooling
- (g) Nuclear Services Closed Cycle Cooling
- (h) Nuclear Services and Decay Heat Sea Water
- (i) Reactor Building Leak Rate Testing
- (j) Reactor Coolant
- (k) Makeup and Purification
- (l) Core Flood

Changes to applicable procedures have been completed correcting any additional discrepancies identified by this review for systems (a) through (l).

Additional procedure changes to correct identified discrepancies in system (i) and the accessible portions of systems (j) through (l) will be complete by April 1, 1984. Those portions of systems (j) through (l) which are inaccessible due to power operation will be reviewed during the next outage of sufficient duration. Currently, the next scheduled outage of sufficient duration will be in May 1984. Procedure revisions as a result of these system walkdowns should be complete by July 31, 1984.

- (4) LONG TERM CORRECTIVE ACTIONS: To prevent further non-compliances, Florida Power Corporation will inform appropriate procedure reviewers that all valves on flow diagrams for safety-related systems that have a tag number designation will be included in a valve line-up checklist. This will be completed by March 1, 1984.
- (5) DATE OF FULL COMPLIANCE: Florida Power Corporation will be in full compliance on July 31, 1984.