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**Florida
Power**
CORPORATION

October 12, 1983
3F-1083-14

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) response to Inspection Report 83-18, dated August 22, 1983.

Florida Power has also discovered that several drawings as discussed in our letter of August 4, 1983 contain 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. We have initiated necessary corrective actions to correct the identified errors and will continue to update the drawings should other deficiencies be identified.

Sincerely,

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

Attachment

GRW:jcf

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

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**FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 83-18
October 12, 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-554A and B) had missing or incorrectly identified valves. Inspection Report 83-18 erroneously indicated that valve DHV 117 had been identified in Inspection Report 82-11. While there was some informal discussion, we do not feel that the level of detail was sufficient to assure either FPC or your staff that we were mutually aware of identified deficiencies.

Although Florida Power Corporation agrees with this violation, we do not agree that all valves must be included in a valve line-up or procedural checklist as implied in this or previous Inspection Reports (e.g., Inspection Report 81-02).

- (2) Designation of Apparent Cause: On September 24 and November 2, 1982, Florida Power Corporation committed "to correct the cited deficiencies." To prevent a 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."

To correct the cited deficiencies responsible personnel were requested to revise procedures to include missing valves that should have been in the valve line-ups. It should be noted that, while Florida Power agreed to example (2) of Violation A in Inspection Report 82-11, we did not agree that all instances cited were deficiencies. Personnel were verbally instructed to give more attention to valve line-ups during future procedure reviews. These procedure reviews cover many areas in addition to valve line-up verification. It may not have been clear that the issue of valve inclusion was not given increased priority.

The corrective actions for Violation 82-11, however, did not address the question of which valves should be included in valve line-ups, thus some valve line-ups do not include inaccessible valves, some instrument root valves, seldom operated valves, and other non-essential valves.

The following is a case-by-case explanation of the apparent cause of the identified "deficiencies":

- (a) DHV-117 is an instrument root valve and difficult to reach. Apparently personnel performing the initial corrective actions discussed above did not consider the inclusion of DHV-117 in OP-404 to be necessary.
 - (b) BSV-61 and 64 are instrument root valves and could have been overlooked during procedure reviews because they are not on the Building Spray drawing which was used for the OP-405 procedural walkdowns. Rather, they are on the drawing describing the Reactor Building Pressure Sensing and Testing system.
 - (c) DFV-40 and 41 and DFV-32 and 33 are instrument root valves; thus they were not included in the valve line-ups of SP-354 (A and B).
 - (d) DFV-42 and 34 (EDG A and B) are drain valves on the fuel tanks. Because any decrease in the level of this tank would indicate if this valve was open, valve position verification was not considered necessary.
 - (e) DJV-34 was correctly listed on the valve line-up for EDG-B.
 - (f) DJV-50, 52, 54 and 56 are closely related drain valves for various EDG tanks. These valves were correctly identified as drains and required to be closed, thus it is probable that the misidentification of the related tanks was overlooked or considered insignificant by procedure reviewers.
 - (g) DLV-29 and 30 are isolation valves for the standby lube oil system on the EDG's. This system is run constantly and one would not expect these valves to be moved from the normally "open" position. Furthermore, this system does not affect the operability of the Emergency Diesel Generator System.
- (3) Short Term Corrective Actions: Florida Power has revised the procedures referenced above to include or correct the cited omissions

or errors although we have not yet resolved which types of valves should be included in valve line-ups.

In addition, Florida Power Corporation has performed a plant walkdown comparing actual plant configuration to the flow diagrams on the following systems:

- (1) Decay Heat Removal
- (2) Building Spray
- (3) Emergency Diesel Generator (A and B)
- (4) Fire Service
- (5) Spent Fuel
- (6) Decay Heat Closed Cycle Cooling
- (7) Nuclear Services Closed Cycle Cooling

Changes to applicable procedures have been initiated to correct discrepancies identified by this review.

- (4) Long Term Corrective Actions: Florida Power Corporation intends to establish a position on which types of valves should be included in valve line-ups. We recognize that the intent of valve line-up checklists is to verify that valves that are significant to the safety of the plant are correctly positioned. To include insignificant valves in these line-up checklists can decrease the attention placed on this verification. The development of the position described above will help to prevent further non-compliances. We will seek comments from appropriate members of your staff prior to its utilization.
- (5) Date of Full Compliance: Florida Power Corporation's position on the content of valve line-ups will be established by December 1, 1983.