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**Florida  
Power**  
CORPORATION

November 9, 1983  
3F1183-09

Mr. R. C. Lewis, Director  
Division of Project and Resident Programs  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 2900  
Atlanta, GA. 30303

Subject: Crystal River Unit 3  
Docket No. 50-302 /G  
Operating License No. DPR-72  
Systematic Assessment of Licensee Performance  
Report for July 1, 1982 to June 30, 1983

Dear Sir:

Florida Power Corporation (FPC) has received your letter dated October 14, 1983, and concurs with the basic conclusions of the report.

The assessment evaluated two functional areas (Radiological Controls and Refueling) as Category 1, eight functional areas (Plant Operations, Maintenance, Surveillance, Fire Protection, Emergency Preparedness, Security and Safeguards, Licensing Activities, and Quality Assurance Program) as Category 2, and no functional areas as Category 3. This represents an improvement in four areas (Radiological Controls, Maintenance, Refueling, and Licensing) and a regression in one area (Surveillance) as compared to the previous SALP assessment.

FPC wishes to provide some clarifying comments in the area of Surveillance. The report stated "a greater emphasis should be placed on upgrading existing procedures to assure that Technical Specification surveillance requirements are being adequately accomplished in the required manner". FPC wishes to point out that the deficiencies discovered in the Engineered Safeguards Actuation System surveillance testing program were discovered through a licensee initiated program to evaluate surveillance procedure adequacy. We believe our attention to surveillance activities has been more than adequate, and procedures in our surveillance program are being properly reviewed and revised.

Your report also noted concerns with FPC's snubber maintenance program in that leakage problems were handled on a case by case basis and not generically. FPC feels that its actions with regard to snubber maintenance have been responsible and timely. Specifically, during the 1981 refueling outage, the main fluid leakage problem was attributed to cracked aluminum bushings. At that time, all aluminum

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November 9, 1983  
3F1183-09  
Page 2

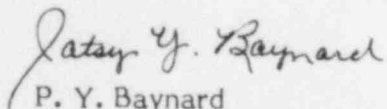
bushings in safety-related snubbers were replaced with a stainless steel fitting to correct this generic problem. During late 1982, it became evident that the fluid leakage problems had not been totally corrected. Fluid leakage from other areas had increased, partially as a result of the disassembly and assembly work that was done during the 1981 refueling outage. To correct this problem, all hydraulic fluid reservoirs were replaced with an improved model during the 1983 refueling outage. Each of these problems was a separate generic problem identified at different times. In each case, FPC took effective corrective action to solve the problem on a generic basis.

In addition, FPC formed a Snubber Task Force in November 1981 for the purpose of evaluating the need to further improve or replace the existing snubbers at CR-3 on a generic basis. This group is continuing its evaluation of the snubber situation at CR-3. FPC believes the above actions were aimed at addressing the generic and specific snubber problems at CR-3.

In the area of Fire Protection, the report stated, "The inability to provide compensatory measures for a degraded fire barrier was a weakness identified during this and previous SALP evaluation periods." FPC wishes to point out that it has always been able to provide compensatory measures for degraded fire barriers. Prompt actions are always taken as soon as degraded fire barriers are identified. Inadequate training in the past has resulted in some personnel not being aware of all fire barrier requirements, which has caused some fire barrier deviations. Improved training and posting of fire barriers will help prevent recurrence of these events in the future.

The SALP report provided by your office provides a valuable tool to identify areas where increased attention should be applied. Florida Power Corporation remains committed to excellence in the operation of Crystal River 3, and we will continue to bring management attention to all areas so that this goal can be met.

Sincerely,

  
P. Y. Baynard  
Assistant to Vice President  
Nuclear Operations

AEF:feb

xc: B. L. Griffin