



**Florida
Power**
CORPORATION

December 20, 1983
3F1283-29

Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection & 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. 83-26

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report. Should there be any questions concerning this information, please contact this office.

Sincerely,

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

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 83-26

VIOLATION:

As a result of the inspection conducted on August 31 - September 22, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained covering those applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Technical Specification 3.3.1.1, Item 14, requires the Reactor Coolant Pump Power Monitors (RCPPM's) to be operable while in operating Mode 1 (Power Operation) with less than four reactor coolant pumps operating.

Contrary to the above, procedure OP-703, Plant Distribution System, had not been revised to reflect a Technical Specification change and consequently on August 23, and 26, 1983, and on September 11, 1983, the RCPs were momentarily bypassed for approximately three minute periods while switching the Reactor Coolant Pump (RCP) power busses. The plant was in Mode 1 with three RCP's running during each occurrence.

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

RESPONSE:

(1) **FLORIDA POWER CORPORATION'S POSITION:**

Florida Power Corporation agrees that during the time period mentioned in the violation, procedure OP-703, Plant Distribution System, was inadequate in that it by-passed RCPs Channels, and a change to correct the procedure was not processed in a timely manner.

NOTE: To clarify any misunderstanding that might result from paragraph two of the Statement of Violation above, Florida Power Corporation is not allowed to bypass redundant RCPs Channels no matter how many Reactor Coolant Pumps are operating. Allowance to bypass the RCPs at a reduced power level and with four pumps operating was only applicable to Cycle IV operation.

(2) **DESIGNATION OF APPARENT CAUSE:**

At the start of Cycle V operation, all instructions to bypass redundant channels of the RCPs should have been deleted from the procedures. At that time, however, only one person, directly involved with plant operation, reviewed Technical Specification Amendments for applicability to Operating Procedures, increasing the probability that a necessary procedure change would be overlooked. Thus, when Amendment 64, "Cycle V Technical Specifications", was issued, this inadequacy in OP-703 was overlooked.

An Interim Change was initiated as soon as it was determined that a procedure change was necessary. The change, however, was apparently misplaced during the review cycle causing an untimely issuance of the Interim Change. This in turn caused the performance of the procedure without the change incorporated into it.

(3) SHORT TERM CORRECTIVE ACTION:

An Immediate Temporary Change was issued on September 11, 1983, to prevent the bypassing of the RCPPM's on the subsequent plant startup. An Interim Change was issued on September 12, 1983, and made permanent on October 20, 1983.

The misplacing of the Interim Change is considered to be a unique event and not indicative of a programmatic breakdown. Therefore, no corrective action is proposed.

(4) LONG TERM CORRECTIVE ACTION:

The review of Technical Specification Amendments has been expanded to include an Operations Qualified Reviewer. This expanded review should preclude overlooking procedures that require changes in the future.

(5) DATE OF FULL COMPLIANCE:

Florida Power Corporation has been in full compliance since September 12, 1983.