

Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 90-302

May 23, 1995
3F0595-21

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: NRC Inspection Report 50-302/95-08

Dear Sir:

In the subject inspection report, you requested that FPC provide a supplemental response to additional examples of previous violations concerning untimely 10 CFR 50.72 / 50.73 reports to the NRC. The purpose of this letter is to provide that response.

ADDITIONAL EXAMPLE OF VIOLATION 94-27-03

This example refers to an occurrence of March 21, 1995 involving breaches of the Control Complex Habitability Envelope (CCHE) that were not reported within one hour as required by 10 CFR 50.72. The untimely report was caused by a misunderstanding of the requirements. This misunderstanding was the result of a lack of adequate criteria to address inadvertent breaches in the CCHE. Interim guidance has been provided to the operations staff stressing appropriate action when a door is left open and unattended or when a similar breach in the CCHE is detected. FPC is preparing a technical specification change request to clarify the technical basis for CCHE operability and associated reportability requirements.

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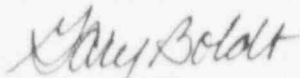
ADDITIONAL EXAMPLE OF VIOLATION 94-27-02

This example refers to LER 95-01 (also involving the CCHIE) which was not submitted within 30 days of the event as required by 10 CFR 50.73. This delay was the result of my personal error in delaying the submittal to get further information. With the information available at the time, I questioned whether the issue was reportable at all. In hindsight, I should have approved the submittal of the original LER as reportable. We could then have corrected the record in an LER supplement should it later have proven to be non-reportable. As we stated in the cover letter to LER 95-01, FPC believed the delay was necessary to provide a meaningful LER. Both FPC and the NRC have been actively working to better define the design/licensing basis of the habitability envelope especially as it relates to the amount of margin "available" in the design calculations. This margin forms the basis for allowed levels of degradation in the various envelope penetrations.

We continue to strive to carefully reconstruct the information relied upon by the NRC Staff in the closure of the generic issue (NUREG-0737 Item III.D.3.4) as well as the best information on the size of openings already accounted for in door testing and other related activities. Our goal is to reduce operator burden and assure an envelope design that can be effectively maintained while we continue to assure control room habitability. Further, we are evaluating various calculational and design alternatives for both radiation dose as well as toxic gas potential. These may include challenging standard assumptions, reliance upon recent Source Term information and other analytical details.

Based on extensive conversations with your staff, we fully appreciate that LERs must be submitted within the 30 day window, even if all information is not known, and then supplemented as the additional information becomes available. It is our intention to assure this with all future reports.

Sincerely,



G. L. Boldt
Vice President
Nuclear Production

GLB/RLM:ff

xc: Regional Administrator, Region II
Project Manager, NRR
Senior Resident Inspector