



84 JUN 5 P12:34

**Florida  
Power**  
CORPORATION

May 30, 1984  
3F0584-16

Mr. J. 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. 84-07

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

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

AEF/feb

Attachment

8407170544 840619  
PDR ADOCK 05000302  
G PDR

FLORIDA POWER CORPORATION  
RESPONSE

INSPECTION REPORT 84-07

VIOLATION

The following violation was identified during an inspection conducted on February 27 -March 2, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33. Regulatory Guide 1.33, Appendix "A" states in part that procedures will be reviewed and approved.

Contrary to the above, Emergency Plan Implementing Procedure EM-307 which was reviewed on December 19, 1983, and approved December 30, 1983 conflicted with Operating Procedure OP-301, in that certain valve alignments required by both procedures were contradictory. This resulted in the Post Accident Sampling System being inoperable with regards to returning a sample to containment in accordance with the procedure. This is a failure to perform an adequate review of procedures.

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

RESPONSE

(1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporation agrees that Operating Procedure OP-301 did not receive an adequate review in respect to changes required for the post accident sampling system valve lineups.

(2) DESIGNATION OF APPARENT CAUSE:

In the development of the PASS modification, personnel review failed to adequately address OP-301, Filling and Venting the RC System, which required a revision as a result of the PASS modification.

(3) CORRECTIVE ACTION:

All four manual isolation valves (RCV-34, -39, -48 and -144) were opened. OP-301 has been revised to leave RCV-34, -39, -48 and -144 in the open position.

(4) CORRECTIVE ACTION TO PREVENT RECURRENCE:

A method will be devised in the MAR process to ensure that all necessary system documentation (procedures, valve check lists, etc.) are in place prior to responsibility for a system being transferred to operations and maintenance.

(5) DATE OF FULL COMPLIANCE:

The immediate corrective action identified in Item 3 above has been completed. This violation is therefore considered resolved.