



Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 90-302

December 29, 1995
3F1295-27

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

Subject: NRC Notice of Violation and Proposed Imposition of Civil Penalty
3N0395-17 dated March 24, 1995

Reference: FPC response to NRC Notice of Violation
3F0495-08 dated April 21, 1995

Dear Sir:

By your letter of March 24, 1995, Florida Power Corporation (FPC) received a Notification of Violation (NOV) and Proposed Imposition of Civil Penalty concerning examples of non-conservative instrument setpoints. In the referenced letter, FPC provided our response which included a detailed Action Plan for correcting the discrepancies. Some of the activity scheduled dates were overly optimistic as discussed in our meeting in Atlanta on November 11, 1995. The purpose of this letter is to provide an updated Action Plan. We have completed approximately 70% of these corrective actions with an overall completion date of August 26, 1996.

FPC appreciates the NRC's recognition of the complexity of this issue. We will continue to keep the NRC informed of our progress.

Sincerely,

G. L. Boldt
Vice President
Nuclear Production

GLB/RLM

Attachment

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

JEH

ATTACHMENT
TECHNICAL SPECIFICATION SETPOINT ACTION PLAN

Setpoint Program Activity	Status	Completion Date
1. Revise the following setpoints to be conservative with ITS Allowable Values and nominal values: A. Variable Low Pressure Temperature (VLPT) for the Reactor Protection System (RPS) B. Emergency Feedwater Initiation & Control (EFIC) Once Through Steam Generator (OTSG) Differential Pressure High C. Shutdown Bypass for the RPS	COMPLETE	
2. Revise ITS Bases to correct references to the Engineered Safeguards Actuation System (ESAS) Bypass Bistable reset functions from "Allowable Value" to "nominal setpoint".	COMPLETE	
3. Revise ESAS Bypass Bistable reset setpoints to be conservative relative to the Final Safety Analysis Report (FSAR) and ITS specified conditions.	COMPLETE	
4. Review plant setpoints to assure that they are conservative to ITS values (RPS, ESFAS and EFIC).	COMPLETE	

5. Review ITS values and group according to category 1, 2, 3 or 4 as shown below: Category 1 - Limits that are specifically designated as Allowable Value in Technical Specifications. Category 2 - Limits that are the same as values used in a safety analysis (the analysis limit) and which have an impact on the performance of the safety function. Category 3 - Limits which are used in the safety analysis but which already contain sufficient margin to the analysis limit or which have negligible impact on the performance of the safety function. Category 4 - Limits which are not used in the safety analysis and which are based on engineering judgement and/or generic regulatory guidance.	COMPLETE	
6. Identify Category 2 ITS values that need to be reviewed with respect to plant equipment and procedures.	COMPLETE	
7. Issue programmatic guidance for design control of plant setpoints.	COMPLETE	
8. ITS change request submitted to the NRC for the purpose of correcting references to Allowable Values.	COMPLETE	
9. Engineering Personnel will be required to review these events in order to ensure that future actions addressing setpoints will include proper consideration of instrument error.	COMPLETE	
10. Complete setpoint calculations for Category 1 ITS Allowable Values.	COMPLETE	
11. Identify any procedures or plant setpoints that require immediate revision based on the results of the calculations for Category 1 ITS Allowable Values.	COMPLETE	

12.	Revise applicable procedures and Calibration Data Sheets to reflect the new RPS, EFIC OTSG Differential Pressure High and ESAS Bypass Bistable setpoints. Revisions will be completed prior to next scheduled performance.	IN PROGRESS	02/29/96
13.	Update the I&C Design Criteria Manual for handling setpoints.	IN PROGRESS	07/01/96
14.	Complete analysis of Category 2 ITS values that will be used in the development of procedural limits.	IN PROGRESS	07/29/96
15.	Identify plant procedures that will require revision based on the results of analysis of Category 2 ITS values.	SCHEDULED	08/12/96
16.	Complete procedure revisions to assure conservatism is applied to Category 1 and 2 ITS values.	SCHEDULED	08/26/96
17.	Revise the ITS bases to depict which values should be error corrected, which are nominal values and the bases for this determination.	SCHEDULED	08/26/96