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**Florida
Power**
CORPORATION

January 25, 1985
3F0185-16

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 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE inspection Report No. 84-26, Supplemental Response

Dear Sir:

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

Sincerely,

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

DDG/feb

Attachment

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PDR ADOCK 05000302
Q PDR

**FLORIDA POWER CORPORATION
SUPPLEMENTAL RESPONSE
INSPECTION REPORT 84-26**

DEVIATION 84-26-01

A letter to the Nuclear Regulatory Commission from Florida Power Corporation dated May 18, 1984, responded to the violation identified in NRC Inspection Report 50-302/84-09 and stated the applicable calibration procedures would be revised to include the cited computer points. This response concluded that these revisions would be completed by July 31, 1984.

Contrary to the above, procedure SP-113, which provides calibration for the reactor power computer point, was not revised until September 13, 1984 and procedure SP-112, which provides calibration for the RCS average temperature computer point, was not revised as of September 27, 1984.

NRC SUPPLEMENTAL RESPONSE

It is apparent from both the issuance of Deviation 84-26-01 and your subsequent response, that your programmatic controls are insufficient to ensure that commitments to the NRC are met. Therefore, it is requested that you address this problem and indicate what steps will be taken to improve the effectiveness of your system for tracking regulatory commitments.

FLORIDA POWER CORPORATION SUPPLEMENTAL RESPONSE

The following sequence provides a clarification of Florida Power Corporation's response to Deviation 84-26-01.

Following the NRC exit on March 9, 1984, the Plant Engineering Superintendent was notified of violation 84-09-05. A change was initiated in May to SP-112 and SP-113, adding computer points R-731 and P-714, respectively, to ensure future calibration of these points.

Deviation 84-26-01 was cited as a result of not completing the corrective action as identified above.

Following notification of deviation 84-26-01, SP-112 was discovered to have been lost in the review cycle. A new change to SP-112 was initiated and walked through for approval on September 26, 1984. Subsequent performance of SP-113 demonstrated that the computer point added to that procedure could not be calibrated at power. As a result, a computer point was deleted from SP-113 on October 10, 1984 and added to SP-112, with final approval on December 28, 1984.

The original commitment date of July 31, 1984 was missed because procedure revisions were not tracked during the review cycle for due dates. Since that time, all personnel have been instructed to note NRC action item status on PRRs (Procedure Review Record) so that reviewers may give appropriate priority for review and comment to assure timely implementation.

Other changes have been made which should improve the effectiveness of our tracking programs:

1. A Nuclear Operations Policy will be implemented by May 1, 1985 which will delineate the responsibilities of personnel assigned to complete FPC commitments/NRC requirements.
2. Each department superintendent is provided with an updated compliance punchlist every two weeks, which indicates status and due dates of all open items.
3. Each Compliance Specialist has been assigned responsibility for a department within the plant staff to advise and assist department superintendents in compliance activities, including commitment due dates.
4. A Procedures Task Force is studying methods by which the procedure review process can be tracked and streamlined in order to reduce the time for implementation of procedure changes.
5. The importance of meeting NRC commitment due dates has been stressed by area managers with department superintendents and supervisors. Copies of the compliance punchlist are provided to the area managers so they can review open items for their respective departments.

Florida Power believes these measures will be sufficient to prevent further deviations.