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**Florida  
Power**  
CORPORATION

August 15, 1984  
3F0884-14

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. 84-20

Dear Sir:

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

RHT/feb

Attachment

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PDR ADDCK 05000302  
Q PDR

**FLORIDA POWER CORPORATION  
RESPONSE  
INSPECTION REPORT 84-20**

**VIOLATION**

10 CFR 20, Appendix A, requires that supplied air hoods used for respiratory protection shall be operated in a manner that ensures that proper air flow rates are maintained, including use of calibrated airline pressure gauges or flow measuring devices.

Contrary to the above, on June 20, 1984, licensee personnel were observed using supplied-air hoods for respiratory protection; the supplied air system was not equipped with an airline pressure gauge or a flow measuring device.

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

**FLORIDA POWER CORPORATION'S POSITION:**

Florida Power Corporation disagrees with the statement of Violation in that it is contrary to actual conditions.

**DESIGNATION OF APPARENT CAUSE:**

At the Crystal River Nuclear Plant, a filter-regulator unit (Bullard) is used at each station where compressed air is utilized for air supplied respiratory equipment. Each filter unit is equipped with a 0-100 PSI Gauge. The pressure gauge is check calibrated at 60 PSI during initial set-up, and at six (6) month intervals while in use. The completion of this check is recorded on an "Air Cart Equipment History Sheet" and stored in a separate file folder for each filter-regulator unit. Up to this point, this calibration check was considered to be adequate. Specifically, the filter-regulator unit located at the Laundry Sorting Building was initiated on May 1, 1984. All checks specified on the "Air Cart Equipment History Sheet" were satisfactorily completed and documented prior to use.

There is no evidence to support that the filter-regulator unit in question was used without an installed pressure gauge. Not all technicians are familiar with the filter-regulator unit maintenance schedule; therefore, the individuals interviewed by the NRC Regional Inspector may have not been cognizant of the required operational checks.

**CORRECTIVE ACTION:**

All pressure gauges used in conjunction with the filter-regulator units were recalibrated within one (1) week following the NRC Inspection.

**CORRECTIVE ACTION TO PREVENT RECURRENCE:**

As a result of the NRC's concern for pressure gauge calibration on the filter-regulator units, the Respiratory Equipment Manual is being revised to formalize the calibration check procedure and require that calibration stickers be applied to each satisfactory gauge.

**DATE OF FULL COMPLIANCE:**

The revised procedure should be implemented by October 31, 1984.