



Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

August 29, 1996
3F0896-26

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Subject: Notice of Violation (NRC Inspection Report No.50-302/96-05)
NRC to FPC letter, 3N0796-09, dated July 12, 1996

Reference: FPC to NRC letter, 3F0896-14, dated August 12, 1996

Dear Sir:

In the subject Inspection Report, Florida Power Corporation (FPC) received a Notification of Violation (VIO) concerning main steam line hangers, temporary changes to the design basis document, Once Through Steam Generator (OTSG) eddy current testing (ECT), battery charger receipt inspections and amendments to purchase requisitions.

The referenced letter provided our response to the subject violations with the exception of VIO 96-05-04, OTSG ECT. It was noted in the referenced letter that the issues involved in VIO 96-05-04 were related to those which were to be addressed in a meeting with NRR scheduled for August 21, 1996. As a result, approval was requested and granted by Mr. George A. Belisle to delay the response to VIO 96-05-04 until August 29, 1996. The meeting with NRR was held as scheduled on August 21. The attached reply to the notice of violation now provides our response to VIO 96-05-04.

Sincerely,

G. L. Boldt
Vice President
Nuclear Production

030075

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

IEDI%

**FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/96-05
REPLY TO A NOTICE OF VIOLATION**

VIOLATION 50-302/96-05-04

Crystal River TS 5.6.1.1 requires written procedures be established, implemented and maintained covering the activities recommended in Appendix A, of RG 1.33, Quality Assurance Program Requirements (Operational), Rev. 2, dated February 1978. RG 1.33, Appendix A, 1978, requires written procedures for maintenance of safety-related equipment such as steam generator tubes.

TS 5.6.2.10 requires that the inservice inspection of Once Through Steam Generator (OTSG) tubes shall be verified acceptable per the acceptance criteria of TS 5.6.2.10.4.

Contrary to the above, on February 28, 1996, the licensee approved a vendor procedure titled, Criteria To Be Applied To Eddy Current Indications By Analysis Guidelines, which provided for verifying acceptance of OTSG tubes utilizing eddy current bobbin coil voltages, and/or the linear dimension of the indication as measured by a rotating pancake coil, in lieu of the acceptance criteria provided by TS 5.6.2.10.4.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The reason for the violation was inadequate communication resulting in misinterpretation of regulatory requirements. FPC had submitted Technical Specification Change Request Number (TSCRN) 203 to the Nuclear Regulatory Commission on May 31, 1995 which, if approved, would have revised the wording of Technical Specification 5.6.2.10 to add criteria which would specifically be applied to the eddy current indications in question.

No final resolution concerning TSCRN 203 had been reached at the start of Refuel Outage 10 (10R) on February 16, 1996. The NRC indicated in a meeting held on February 21, 1996 to discuss TSCRN 203 that approval of the amendment request was unlikely to be accomplished in a time frame to support the 10R inspections and that the only remaining alternative was to follow the existing Technical Specification and accepted industry practice.

On February 22, 1996, FPC initiated contact with other PWR facilities to assess industry practice with respect to disposition of eddy current signals which could not be sized using existing eddy current technology. FPC made every effort to obtain analyst guidelines that had been recently inspected and found to be acceptable by the NRC. Two of these guidelines obtained used advanced NDE methods or criteria in addition to straight application of the Standard Technical Specification repair limit of 40% through wall in limited applications. In each case, the additional guidelines had not been incorporated into the respective plant's technical specifications prior to use.

Subsequent to FPC's review of industry written guidance on the subject, the CR-3 specific analyst guidelines were implemented under the 10 CFR 50.59 process. These guidelines provided a disposition strategy intended to augment Technical

Specification 5.6.2.10.4 repair criteria for non-quantifiable, low signal-to-noise (S/N) volumetric indications. Approval and use of the analyst guidelines was based on:

1. Identification of provisions in several industry analyst guidelines which utilized methods other than a 'qualified' through wall sizing technique to disposition eddy current indications as acceptable to remain in service. The analyst guidelines reviewed by FPC included guidance to address low S/N indications where existing TS criteria and ECT techniques provided limited guidance. Hence, FPC concluded use of similar guidance at CR-3 would represent use of accepted industry practice and could be implemented under 10 CFR 50.59.
2. The written interpretation of Technical Specification 5.6.2.10 provided in NRC CAL 2-94-004 wherein the NRC Staff agreed the existing CR-3 Technical Specifications did not address the flaws which produce these low signal-to-noise eddy current indications.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. FPC submitted revisions to TSCRN 203 to the NRC to obtain approval of a one-cycle technical specification amendment which addresses the indications in question. License Amendment No. 154 was issued on April 30, 1996.
2. Several discussions have been held between FPC Senior Management and Engineering personnel involved in the approval process for the disposition strategy used during Refuel 10. The need to be more sensitive to NRC staff positions relating to Technical Specification compliance and to seek clarification from the NRC Staff when necessary was reinforced.
3. FPC Senior Management met with Senior NRR Technical Branch and Project Management on August 21, 1996 to discuss the handling of TSCRN 203. The intent of this meeting was to discuss the root causes of the problems encountered in processing of TSCRN 203 and the corrective actions to prevent recurrence. While VIO 96-05-04 was not specifically discussed, the importance of clear and frequent communication to understand the NRC's expectations on regulatory issues was re-iterated.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Increased FPC management oversight and communication with the NRC will be applied to future interactions requiring regulatory coordination. FPC management will apply a more questioning attitude to validate FPC staff positions with NRC project management. In addition, FPC is in the process of conducting Regulatory Training aimed at increasing conservatism in decisions involving regulatory requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with Technical Specification 5.6.2.10 was achieved upon the issuance of License Amendment No. 154 on April 30, 1996.