



**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

December 10, 1992
3F1292-02

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

Reference: 1) NRC letter to FPC dated November 16, 1992
Notice of Violation - Inspection Report 92-25

Dear Sir:

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

Sincerely,

P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

EEF:mag

Enclosure

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

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FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/92-25
REPLY TO A NOTICE OF VIOLATION

VIOLATION 50-302/92-25-02

Technical Specification 6.8.1 requires that written procedures shall be established implemented and maintained as recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Appendix "A" recommends procedures for performing surveillances, and power operation and process surveillance.

Surveillance Procedure SP-130, "Operating Daily Surveillance Log", Revision 120, required reactor coolant pump (RCP) lube oil collection tank (LOT) level and other plant parameters to be logged once per shift, and included acceptance criteria which required notification of Systems Engineering if LOT level reached 10%, and stated "...ENSURE that the LOT's are emptied prior to exceeding 12%." The 12% limit was based on 10 CFR 50, Appendix R requirements for free volume for collection of potentially flammable RCP lube oil.

Contrary to the above, on the morning of October 4, 1992, LOT level reached 14%. Tank level increased from 10% to 14% during the previous 24-hour period. Although Surveillance Log data showed the increasing level, the licensee failed to take action to ensure that the LOTs were emptied prior to exceeding 12%.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

The reason for this violation was personnel error in that the tanks were not emptied prior to exceeding the administrative limit. The volume rate of rise in the tanks for this event was a direct result of increased condensation from the Reactor Building (RB) atmosphere. Since the tanks had not been emptied earlier, there was insufficient time to plan and accomplish a RB entry in order to drain the tanks prior to exceeding current design limits. The increased condensation was the consequence of a small, two gallons per minute, Feedwater System (FW) leak in containment and decreasing temperature of the Nuclear Services Closed Cycle Cooling Water System (SW) in the RB.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Action was initiated to make an entry into the RB and drain the LOTs. The readings were returned to within specification at 14:17 on October 4, 1992.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Action to prevent recurrence will be to make an Operations Study Book entry to inform applicable Operations personnel of this event and for them to take prompt action to have the LOTs drained prior to exceeding administrative requirements.

In addition, a plan to repair the feedwater leak is in place and a plant modification to control the cooling water temperature is in process.

Additionally, a recent change to the procedure for taking operator shift logs incorporated a hand-held electronic computer capable of providing audible alarms for out-of-tolerance readings. This format and revised wording now associated with the LOT level record should further enhance personnel awareness and timeliness for draining the LOTs.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The corrective actions are planned for completion in the Mid-Cycle 9 outage currently scheduled for the Spring of 1993.