

51-312
December 21, 1992

Edward S. Wollesen
Management Support Services
420 Winona Blvd.
Rochester, New York 14617

Dear Mr. Wollesen:

Your letter of May 25, 1992, to Mr. Oscar DeMiranda of NRC Region II has been referred to me for response. The attachment to your letter contains your comments on the Director's Decision regarding Crystal River Unit 3 dated November 3, 1991, in response to the 2.206 petition (Petition) dated June 25, 1991, that was filed on your behalf by Mr. Louis D. Putney. The Director's Decision examined the allegations in the Petition and found that no substantial health and safety issues had been raised in the Petition.

The NRC staff reviewed the comments in the attachment to your letter of May 25, 1992 and identified those that included information related to alleged safety concerns. This information was found to contain both additional comments and repeat information on allegations in the Petition, but no new allegations related to safety concerns. Each item of information related to an alleged safety concern is listed in the Enclosure, with appropriate NRC response.

In addition to NRC Inspection Report (IR) 50-302/91-15, dated September 11, 1991, concerning the issues raised in the Petition, three inspections were performed and IRs issued which relate to your comments: 50-302/91-17, dated September 26, 1991; 50-302/92-18, dated October 1, 1992; and 50-302/92-22, dated October 5, 1992. With the exception of enclosed IR 50-302/91-17, copies of the above IRs were sent to you as enclosures to a letter from Mr. George Jenkins at NRC Region II dated December 14, 1992.

Based on our review of the information with your May 25, 1992 letter, and the inspections which we performed relative to your comments, we conclude that no new safety concerns have been identified.

Sincerely,
(Original Signed By)
Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulations

Enclosures:

1. Safety concerns/response
2. IR 50-302/91-17

cc w/enclosures:
See next page

*See Previous Concurrence

LA:PDII-2*	PM:PDII-2*	D:PDII-2*	AD:RII*	OGC*	Region II*
ETana	HSilver	HBerkow	GLainas		EMerschhoff
12/10/92	12/11/92	12/11/92	12/11/92	12/17/92	12/15/92

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Mr. Percy M. Beard
Florida Power Corporation

cc:

Mr. A. H. Stephens
General Counsel
Florida Power Corporation
MAC-A5D
P. O. Box 14042
St. Petersburg, Florida 33733

Mr. Bruce J. Hickie, Director
Nuclear Plant Operations
Florida Power Corporation
P. O. Box 219-NA-2C
Crystal River, Florida 34423-0219

Mr. Robert B. Borsum
B&W Nuclear Technologies
1700 Rockville Pike, Suite 525
Rockville, Maryland 20852

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323

Mr. Jacob Daniel Nash
Office of Radiation Control
Department of Health and
Rehabilitative Services
1317 Winewood Blvd.
Tallahassee, Florida 32399-0700

Administrator
Department of Environmental Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Crystal River Unit No.3
Generating Plant

Mr. Robert G. Nave, Director
Emergency Management
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100

Chairman
Board of County Commissioners
Citrus County
110 North Apopka Avenue
Inverness, Florida 32650

Mr. Rolf C. Widell, Director
Nuclear Operations Site Support
Florida Power Corporation
P. O. Box 219-NA-2I
Crystal River, Florida 34423-0219

Senior Resident Inspector
Crystal River Unit 3
U.S. Nuclear Regulatory
Commission
6745 N. Tallahassee Road
Crystal River, Florida 34428

Mr. Gary Boldt
Vice President - Nuclear
Production
Florida Power Corporation
P.O. Box 219-SA-2C
Crystal River, Florida 34423-0219

NRC RESPONSE TOCOMMENTS IN LETTER FROM MR. WOLLESEN OF MAY 25, 1992

1. Comment 13: Harassment of Mr. Wollesen for his involvement in the program to control the plant installed instrument calibration.

Response: This is the subject of an ongoing DOL case. The NRC will review the final disposition of this case to determine if enforcement is warranted.

2. Comment 14: Many "as built" drawings are not being maintained and are not up to date.

Response: Accuracy of drawings was addressed by the routine inspection program and by IR 50-302/91-15. The licensee's drawing program was found to be adequate.

3. Comment 16: Auditors are not trained in the whole plant process or in proper auditing practices.

Response: This was addressed by IR 50-302/91-17. The NRC found that QA audit group supervisory and audit/evaluation personnel were qualified as lead auditors per ANSI N45.2.23.

4. Comment 17: NOCS does not contain all procedures for quality activities in the plant. Also, the POQAM procedure index is not controlled or accurate, and does not include all plant procedures.

Response: This was addressed by IR 50-302/92-18. NRC inspection found that the NOCS database and POQAM procedure index did not contain all procedures for quality activities in the plant. However, this condition did not violate NRC requirements and posed no safety concern. The NRC also found that the POQAM index of procedures was not treated as a quality record in that copies were not maintained in the permanent records storage files. However, this condition was found to comply with NRC requirements and posed no safety concern. The inspection also found that the POQAM index of procedures and the NOCS database were being maintained accurately.

5. Comment 22: NI-14 and 15 were restored to "operable" without knowing if the contract repair person, process, or materials were qualified.

Response: This was previously addressed and determined to not warrant followup. The contract repair person was a manufacturer's representative. The repair person, materials, and process were qualified under the accepted manufacturer's quality assurance program.

6. Comment 23: AI-300 Rev. 3 did not show training for the regular members of the PRC but only the alternates.

Response: This was addressed by IR 50-302/92-18. NRC inspection found that AI-300, Rev. 3, dated May 9, 1974, did not stipulate training requirements for any members of the PRC. However, there was no safety concern because the current revision (33) of AI-300 did require training for all members of the PRC and that training had been done.

7. Comment 26: Qualified Reviewers failed to perform their assigned duties, as evident in PM-200 Rev. 3, 4, and 5.

Response: This was addressed by IR 50-302/92-22. NRC inspection found that the licensee's technical review of procedures was generally adequate, with a weakness in identifying errors in procedure revisions. While many procedure errors were noted, these errors did not result in any safety concerns. Additional RII followup inspection is planned.

8. Comment 29: Qualified Reviewers left obvious mistakes in PM-200 Rev. 3, 4, and 5.

Response: This is a duplicate of Comment 26 above. The same response to Comment 26 applies.

9. Comment 33: Workers and middle management do not have adequate controls to preclude the use of out of date procedures, as seen by several violations.

Response: The allegation of out of date procedures in the PRC Guidelines Manual was addressed in IR 50-302/91-15, where the NRC identified this issue as a non-cited violation. The licensee took appropriate corrective action, and voluntarily responded to IR 50-302/91-15 to contest the NCV. In the acknowledgement letter to the licensee, the NRC stated that the NCV stands as written. Also, the routine inspection program looked at use of procedures and during the last 16 months (SALP period) identified no other instances of licensee use of out-of-date procedures.

10. Comment 34: The PRC, representing higher levels of management, can allow and approve instructions to use out of date instructions as a part of the procedures to be followed.

Response: This is similar to Comment 33 above. The same response to Comment 33 applies.

process of completing the requirements for certification at the time of this inspection.

In addition to reviewing completed audit reports, the inspectors also reviewed completed Quality Programs Surveillance Reports (QPSR)/ Quality Programs Evaluation Reports (QPER). The following QPSRs/ QPERs were reviewed:

QPSR 90-01, Thermal Science, Inc. (TSI) Fire Barrier Surveillance

QPSR 90-02, Fire Brigade (FB) Team Member and Medical Emergency Team (MET) Representative Qualification Surveillance No. 1

QPSR 90-03, Packaging and Shipping of Radioactive Material Shipment 90-3

QPSR 90-05, Guard Posting and Turnover Surveillance

QPSR 90-07, SDR Process Evaluation

QPSR 90-08, Periodic Compliance with AI-402B (Final) (Surveillance Procedures)

QPSR 90-09, SWP-2A Shaft

QPSR 90-10, Industrial Safety Programs

QPSR 90-11, Nuclear Projects Procedure Group Evaluation

QPSR 90-12, Technical Specification Violation Review (6.5.1.6.e)

QPSR 90-28, Summary of QA Surveillance Activities for July 12 through July 31, 1990

QPSR 90-33, Summary of QA Surveillance Activities for November 1-16, 1990

QPSR 90-34, Review of NGRC Safety Evaluation Findings

QPSR 91-06, INPO Follow-up

QPER 91-01, Operator Physicals

QPER 91-03, Problem Report System

QPER 91-04, Verification Planning Process

QPER 91-05, Quality of Maintenance Field Work

QPER 91-06, Environmental Qualification (EQ) Training

QPER 91-07, Material Traceability - EDG

QPER 91-08, Chemical Control Process

QPER 91-09, As-Built Drawing - NCR Follow-up

The inspectors noted that the QPSRs and QPERs identified both negative and positive findings for the activities observed.

During NRC Inspection 50-302/91-12, concerns were raised over Quality Programs Administrative Procedure QAP No. 22. Subsequent to that inspection the licensee has revised QAP No. 22 to address the concerns and to enhance the program. One change involved having QPD perform an evaluation at least semiannually to review the adequacy of corrective actions for problem reports initiated as a result of previously conducted evaluations and corrective actions implemented to resolve other problem reports where conditions were significantly adverse to quality. Other changes included (1) QPD will initiate a problem report when the line organization being evaluated does not agree that a problem exists; (2) findings that are not a violation of regulations or requirements will be documented as recommendations instead of concerns; and (3) certain recommendations in the evaluation report will be identified as requiring follow-up by QPD personnel. QPD management stated that recommendations will be identified in audit reports also. During review of QAP No. 8, Quality Program Audits, the inspectors noted that QAP did not address the use of recommendations. QPD personnel stated that QAP No. 8 was in the process of being revised and it will address the handling of recommendations for audit reports.

After reviewing various activities in the licensee's QA audit and surveillance/evaluation program, the inspectors concluded that the licensee is complying with the QA program commitments. Subsequent to NRC Inspection 50-302/91-12, the licensee has taken positive actions to address the concerns raised in the inspection report and the effectiveness of QA program is considered satisfactory.

Violations or deviations were not identified in the areas inspected.

3. Exit Interview

The inspection scope and results were summarized on August 30, 1991, with those persons indicated in paragraph 1. The inspectors described the areas inspected and discussed in detail the inspection results. Proprietary information is not contained in this report. Dissenting comments were not received from the licensee.

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Docket File 50-302

NRC & LPDRs

T. Murley/F. Miraglia 12/G/18

J. Partlow 12/G/18

S. Varga

G. Lainas

H. Berkow

E. Tana

H. Silver

OPA

OCA

PD22 Rdg File

J. Taylor

D. Williams, IG

V. Yanez (2) (P-223)

C. Cater, SECY

M. Malsch, OGC

J. Goldberg, OGC

ASLBP

S. Burns, OCAA

ACRS(10)

M. Sinkule RII