



05 MAY 22 AIO: 05

**Florida  
Power**  
CORPORATION

May 17, 1985  
3F0585-13

Dr. J. Nelson Grace  
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  
Inspection Report No. 85-13

Dear Sir:

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

Sincerely,

W. S. Wilgus  
Vice President  
Nuclear Operations

AEF/feb

Attachment

8506200421 850517  
PDR ADOCK 05000302  
G PDR

IE 11/11

FLORIDA POWER CORPORATION  
RESPONSE  
INSPECTION REPORT 85-13

VIOLATION 85-13-01

10 CFR 50, Appendix B, Criterion II, requires that activities affecting quality shall be accomplished under suitably controlled conditions, including suitable environmental conditions for accomplishing the activity. The licensee's Quality Program, Revision 5, Section 1.7.1.12.7, requires that facilities used for calibrating sensitive or close tolerance measurement and test equipment provide an environment that is sufficiently controlled to allow the measuring device to be evaluated and calibrated to its required accuracy. Implementing procedure NCL-01, Test Equipment, Standards, and Calibration Control, Revision 6, Section 5.2, requires the Nuclear Calibration Lab Supervisor to assure the calibration facilities meet these environmental standards.

Contrary to the above, the licensee failed to establish specific requirements for the control of temperature, humidity, or other factors which may affect the accuracy of calibration activities. Environmental conditions were not monitored or recorded in the Calibration Laboratory.

This is a Severity Level IV violation (Supplement I).

RESPONSE

1) Florida Power Corporation's Position:

FPC agrees with the violation as stated.

2) Designation of Apparent Cause:

This violation was caused by inadequate procedural controls. FPC procedure NCL-01 did not contain specific requirements for temperature and humidity control, nor did it contain explicit requirements to monitor and record environmental conditions in the Calibration Laboratory.

3) Interim Corrective Action:

NCL-01 has been changed to include specific temperature and humidity requirements for the Calibration Lab during the time that calibration activities are being conducted. This procedure also requires continuous monitoring of temperature and humidity conditions. Temperature and humidity conditions are recorded at least once per operating shift. Temperature and humidity conditions have been monitored and recorded since the NRC inspector identified this deficiency.

4) Corrective Action to Prevent Recurrence:

The specific requirements for environmental monitoring of the Calibration Lab will be retained in NCL procedures.

5) Date of Full Compliance:

Procedure NCL-01 has been revised effective May 17, 1985.

VIOLATION 85-13-02

10 CFR 50, Appendix B, Criterion XVI, as implemented by the licensee's QA program, requires establishing measures to assure that conditions adverse to quality, such as defective material and equipment, are promptly identified and corrected. Station procedure NCL-01, Test Equipment, Standards, and Calibration Control, Revision 6, Section 6.7, requires that when a measuring and test equipment out-of-tolerance report is not evaluated within two weeks, it shall be escalated to the next higher supervisory level to obtain resolution.

Contrary to the above, when an out-of-tolerance report is sent to a contractor for evaluation, the escalation policy was not applied and alternate measures did not exist to ensure timely completion. Ten contractor evaluations were delinquent from three to seventeen months.

This is a Severity Level V violation (Supplement I).

RESPONSE

1) Florida Power Corporation's Position:

Florida Power Corporation agrees with the stated violation.

2) Designation of Apparent Cause:

The Calibration Lab administrative controls were inadequate. Controls were not in place in the Calibration Lab to identify the FPC supervisor responsible for contractor work. Attempts to escalate equipment out-of-tolerance reports for evaluation were not always directed to the work group that had knowledge of the use of the out-of-tolerance equipment.

3) Corrective Action:

All overdue out-of-tolerance reports listed in the inspection report have been satisfactorily evaluated and closed. A complete review of out-of-tolerance reports has been conducted to ensure that there are no other deficiencies.

4) Corrective Action to Prevent Recurrence:

NCL-01 has been revised to require that the FPC supervisor immediately responsible for work activities be identified when test equipment is signed out by anyone other than an FPC employee. The existing escalation policy will be applied to contractor signouts to ensure the timely completion of out-of-tolerance reports.

5) Date of Full Compliance:

NCL-01 was revised on May 17, 1985 to correct the identified nonconformance.