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**Florida
Power**
CORPORATION

May 31, 1985
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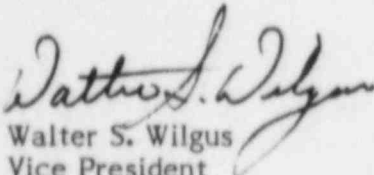
Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 85-18

Dear Sir:

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

Sincerely,


Walter S. Wilgus
Vice President
Nuclear Operations

AEF/feb

Attachment

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FLORIDA POWER CORPORATION
RESPONSE

INSPECTION REPORT 85-18

VIOLATION 85-18-01

Technical Specification 6.8.1a requires the establishment and implementation of the applicable procedures recommended in Appendix A to Regulatory Guide 1.33, November 1972. Section F of Appendix A to Regulatory Guide 1.33 recommends "procedures for combating emergencies and other significant events", among which are listed "Acts of Nature," including earthquakes.

Contrary to the above, the licensee had established and implemented a procedure (AP-961) for emergency actions during earthquakes which was inadequate in that it could not be used in a timely manner to determine if the reactor should be shut down in the event of an earthquake.

This is Severity Level V Violation (Supplement I).

RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation (FPC) concurs with the stated violation in that AP-961, Earthquake, was previously identified by FPC as being inadequate and it was not revised in a timely manner.

(2) Apparent Cause of Violation:

The cause of the violation is administrative error in that the procedure change was initiated but was not adequately followed through to implementation.

(3) Corrective Actions:

Upon identification by the NRC Inspector, the changes to AP-961 were made and hand carried through the review cycle. Revision one (1) to AP-961, which included the appropriate change, was implemented on April 16, 1985.

(4) Action Taken to Prevent Recurrence:

FPC's Administrative Procedure has been revised to initiate a parallel review of proposed POQAM procedure changes instead of a series review. It also gives responsibility to the Responsible Section Superintendent/Supervisor to assure the procedure completes the review cycle.

(5) Date of Full Compliance:

Florida Power Corporation is in full compliance to the above corrective actions as of April 16, 1985.