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**Florida
Power**
CORPORATION

May 31, 1985
3F0585-24

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
II Inspection Report No. 83-27 Second Revised Response

Dear Dr. Grace:

Florida Power Corporation provides the attached as our second revised response to Violation 83-27-01 of the subject inspection report.

Sincerely,

W. S. Wilgus
Vice President
Nuclear Operations

DLT/feb

Attachment

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**FLORIDA POWER CORPORATION
SECOND REVISED RESPONSE
VIOLATION 83-27-01**

A. VIOLATION

Technical Specification 4.4.6.2.1d requires the determination of Reactor Coolant System (RCS) leakage at least once per 72 hours during steady state operation while the plant is in operational modes 1 through 4.

Contrary to the above, during the time period from 6:00 a.m. on October 17 until 9:30 p.m. on October 21, no leakage determination was made.

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

A. RESPONSE

1. Florida Power Corporation's Position:

Florida Power Corporation agrees that, during the time period mentioned in the violation, no Reactor Coolant System leakage determination was made. However, we take exception to the statement made in the body of the inspection report that "No consideration was given the steady state plateaus during the power reduction." In fact, Surveillance Procedure SP-317, RCS Water Inventory, was addressed at the time of its next scheduled performance. However, non-steady state plant conditions (transient xenon conditions) existed that prevented performance of the RCS leakage determination. Nevertheless, when steady state conditions were once again achieved, the surveillance was not rescheduled and performed.

2. Designation of Apparent Cause:

As stated in the observation for the finding, Surveillance Procedure SP-317, RCS Water Inventory, is completed on Mondays, Wednesdays, and Fridays. During the time frame noted in the violation, SP-317 was performed satisfactorily on Monday, October 17, 1983. Although power was steady at 9% during the time that SP-317 is normally performed, xenon concentration was in a transient condition in the reactor. This forces the operator to change make-up tank levels for boration and deboration and manually control T_{ave} with the control rods. At the time of the determination that the plant was in a non-steady state condition, a notation should have been made in Surveillance Procedure SP-443, Master Surveillance Plan, to do SP-317 as soon as the plant was in a steady state condition. Lack of this notation resulted in not conveying to the following shifts, the need to perform SP-317 as soon as the plant was stable. When xenon reached equilibrium conditions (an essential aspect of how FPC defines steady state conditions), SP-317 should have been performed.

3. Immediate Corrective Action:

Shift Supervisors have been reminded of the necessity to carry forward any outstanding Technical Specification required surveillance that cannot be performed as originally scheduled due to current plant conditions.

4. Long Term Corrective Action:

Experience has shown the manual method of surveillance tracking used at CR-3 to be reliable. In order to further enhance this reliability, an automated surveillance tracking and scheduling program has been developed. This system will be used as a backup to the existing manual system. It will enable appropriate personnel to check on each shift for surveillances not completed up to that time. The surveillance will show up as due until it has been completed satisfactorily. Due to space problems in the Control Room, the computer terminal for the automated surveillance tracking system will be located in an office just outside the Control Room.

5. Date of Full Compliance:

Florida Power Corporation was in full compliance on October 21, 1983 when the RCS leakage determination was satisfactorily completed. The automated surveillance tracking system was in operation on December 28, 1984.