



**Florida
Power**
CORPORATION

June 14, 1985
3F0685-14

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. 85-19

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/rw

Attachment

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-19

VIOLATION 85-19-01

10 CFR Part 50, Appendix B, Criterion XVI requires an adequate corrective action program to ensure that nonconformances are corrected.

The Florida Power Corporation (FPC) Quality Program as delineated in Final Safety Analysis Report (FSAR) paragraph 1.7.1.16 implements the requirements of Criterion XVI and, in addition to identifying and correcting a nonconformance, requires a followup on these corrective actions to assure proper implementation.

Contrary to the above, on April 25, 1985, the corrective action program was not adequate in that a nonconformance identified during the period of August 1-31, 1984, involving discrepancies in the annunciator response procedures, and documented as complete by December 31, 1984, was not adequately corrected.

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

RESPONSE

(1) Florida Power Corporation's Position:

FPC concurs with the stated violation in that the corrective action involving discrepancies in the annunciator response procedures was not adequate in identifying all annunciator discrepancies.

(2) Apparent Cause of Violation:

The cause of the violation is attributed to an inadequate comparison of the annunciator response procedures and the annunciator alarm panel.

(3) Corrective Action:

The appropriate procedures have been revised to incorporate the recent findings. Two independent walkdowns of the annunciator windows for comparison with their applicable procedures will be conducted before completion of the present refueling outage. The purpose of the walkdown will be to ensure that any alarms added during the outage have been added to appropriate procedures.

(4) Action Taken to Prevent Recurrence:

The corrective action described above is sufficient to prevent recurrence.

(5) Date of Full Compliance:

Full compliance will be achieved prior to startup from Refuel V.

VIOLATION 85-19-05

Technical Specification 6.8.1.b requires the use of and adherence to refueling procedures.

Refueling Procedure FP-601 (Fuel Handling Equipment Operations) contains enclosures to verify that fuel handling bridge startup and shutdown are performed in accordance with steps outlined in the procedure. The procedure also contains a log sheet to document fuel handling bridge shutdown and surveillance testing. Procedure FP-601 requires these enclosures to be completed whenever the Spent Fuel Handling Bridge (FHCR-3) is started, shutdown, or tested.

Contrary to the above, during the period April 8 - April 24, 1985, FHCR-3 was started, shutdown and tested without the appropriate verifications and documentation required by procedure FP-601.

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

RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation concurs with the stated violation in that during the period April 8 - April 14, 1985, FHCR-3 was started, shutdown, and tested without the appropriate verifications and documentation required by procedure FP-601.

(2) Apparent Cause of Violation:

FPC's administrative instructions allow routine and repetitive procedural action that is frequently repeated without a procedure present. (AI-400, Section 4.3.5). The startup, shutdown, and testing of the Fuel Handling Bridge was considered to meet this criteria and, therefore, the documentation was overlooked.

(3) Corrective Action:

A short term instruction was issued to remind Operations personnel to adhere to the procedure FP-601 when starting up and shutting down fuel handling equipment.

(4) Action Taken to Prevent Recurrence:

The corrective action described above is sufficient to prevent recurrence.

(5) Date of Full Compliance:

Florida Power Corporation was in full compliance upon completion of the above corrective actions on May 7, 1985.