Yellow

JUN 21 1985

Florida Power Corporation
ATTN: Mr. W. S. Wilgus
Vice President Nuclear Operations
P. O. Box 14042, M.A.C. H-2
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: REPORT NO. 50-302/85-07

Thank you for your response of May 7, 1985, to our Notice of Violation issued on April 8, 1985, concerning activities conducted under NRC License No. DPR-72.

We have reviewed your response to the violation and have concluded, for the reasons presented in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. Therefore, in accordance with the requirements of 10 CFR 2.201, please resubmit your response to the Notice within 30 days of the date of this letter.

The response directed by this letter and the enclosure are not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

Original signed by D. Verrelli

Roger D. Walker, Director
Division of Reactor Projects

Enclosure:
Staff Evaluation of Licensee
Response

cc w/encl:
E. M. Howard, Director
Site Nuclear Operations
P. F. McKee, Nuclear Plant Manager
G. R. Westafer, Manager
Nuclear Operations Licensing
and Fuel Management

bcc w/encl:
Document Control Desk
State of Florida
NRC Resident Inspector
R. Brewer

RII	RII	RII	RII	RII	RII
LEFoster:es	TEConlon	ARHerdt	PBemis	GJenkins	VLBrownlee
6/14/85	6/14/85	6/19/85	6/17/85	6/19/85	6/19/85

6/18/85

IE 01

ENCLOSURE

STAFF EVALUATION OF LICENSEE RESPONSE DATED MAY 7, 1985

You make the following statement in your denial:

> Following an unplanned reactor trip, printouts of computer monitored data are used to evaluate the cause of the reactor trip and the response of plant safety systems. The results of the evaluation are documented in "Restart After Reactor Protection System Actuation" which is Enclosure 16 of the Operations Section Implementation Manual. AI-1100 does require that Enclosure 16 be collected, stored, and maintained as Quality Assurance Records. Therefore, FPC disagrees that printouts of the computer monitored data constitutes records of facility operation and as such are not required to be stored and maintained as Quality Assurance Records.
>
> For all reactor trips FPC has collected, stored, and maintained the computer printouts but not as Quality Assurance Records. FPC does agree that treating these computer printouts as Quality Assurance Records would be beneficial. Accordingly, the computer printouts for recent (1983 and later) reactor trips have already been included in our quality files. FPC intends to treat future reactor trip computer printouts as Quality Assurance Records.

Our contention is that the printouts of your computer systems constitute records of facility operation, in that they are the essential source of information used to conduct a meaningful review and analysis of your plants transient response. As such, the printouts constitute a record of facility operation under Technical Specification (TS) 6.10.1.a and must be retained as Quality Assurance Records for five years.

Section 1.7.1.17 of your Quality Program (QP) identifies records required to be retained by TS as Quality Assurance Records. However, Administrative Instruction (AI)-1100, which implements QP 1.7.1.17, omits any reference to TS required records as Quality Assurance Records. Consequently, AI-1100 fails to fully implement the Quality Program.

It is acknowledged that Enclosure 16 of the Operations Section Implementation Manual, "Restart After Reactor Protection System Actuation," provides an evaluation of the computer printouts and is retained as a Quality Assurance Record. However, a review of several Enclosure 16 evaluations revealed that this summary provides only indirect testimony of adequate plant response. It is not a document which, by itself, assists in comparing the transient event with known or expected plant behavior. It simply documents that supervisory personnel were satisfied that the plant responded as designed. Proof to this affect can only come from an analysis of the source documents; the computer printouts upon which Enclosure 16 is based.

In summary, we are satisfied that the required initial reviews and analyses of the computer printouts have been performed by your staff prior to returning the reactor to power operation. However, the ability to independently assess the transient hinges on the availability of the computer printouts. Such an independent assessment may be required subsequent to reactor startup either by your safety review group or, as occurred during Inspection 85-07, by members of the NRC staff. To assure that the printouts will be available for future use or review, their custody must be remanded to your Records Management Department for protected storage, as required by Section 1.7.1.17 of the FPC Quality Program and TS 6.10.1.a. Since Administrative Instruction No. AI-1100 did not address the above requirements, which resulted in data used in post trip review analysis not being properly collected, stored, and maintained, constitutes the violation as stated in the Notice of Violation.