

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

Docket No. 50-302
License No. DPR-72

During NRC inspections conducted on August 11 through September 7, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381: June 30, 1995/NUREG 1600), the violations are listed below:

- A. Technical Specifications (TS) 5.6.1.1 requires written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A, February 1978. RG 1.33, Appendix A, requires administrative procedures regarding procedure adherence. AI-400E, Performance and Transmittal of Procedures, paragraph 1.1, Policy, states that verbatim compliance of procedures is required, but procedures must not be blindly followed.

PT-366, Toxic Gas Detection System Calibration, Step 4.7.1, directs the SAMPLE/ZERO switch to be placed in the ZERO position.

Contrary to the above, on August 13, 1996, a technician failed to follow the requirements of PT-366, Toxic Gas Detection System Calibration, Step 4.7.1, and placed the SAMPLE/ZERO switch in the OFF position, resulting in the inadvertent initiation of the control room emergency ventilation system.

This is a Severity Level IV Violation (Supplement 1).

- B. The Crystal River Physical Security Plan, paragraph 5.5.1, requires that all personnel not issued a yellow or green identification badge be handled as visitors and be escorted at all times while within the protected or vital areas.

Contrary to the above, on August 14, 1996, at approximately 11:45 a.m., an escort person failed to maintain a visitor under surveillance, in that an unescorted vendor was observed in the Technical Support Center.

This is a Severity Level IV Violation (Supplement III).

- C. 10 CFR 50.59, Changes, Tests, and Experiments, in part, allows the licensed facility to make changes in the facility or procedures as described in the Safety Analysis Report, without prior Commission approval, unless the proposed change involves an unreviewed safety question. The licensee shall maintain records of changes in the facility or changes in procedures, to the extent that these changes constitute changes in the facility or changes in procedures as described in the safety analysis report. These records must include a written safety evaluation, which provides the bases for the determination that the changes do not involve an unreviewed safety question.

FSAR Section 4.1.2.7, Table 4-10 and Table 9-3 specify that the hydrogen in the reactor coolant system shall be between 15 - 40 standard cc/kg of

water. These requirements were implemented by Procedures CH-400, Nuclear Chemistry Master Scheduling Program, and CP-142, Primary Chemistry Guidelines.

Contrary to be above, by verbal directive of management in 1993, the reactor coolant system hydrogen concentration was changed from 15 - 40 cc/kg of water to 25 - 50 cc/kg of water, without a written safety evaluation report to provide the bases for the determination that the change did not involve an unreviewed safety question. The change to the implementing procedures, CH-400 and CP-142, occurred in December 1995, again, without a written safety evaluation report to provide the bases for the determination that the changes did not involve an unreviewed safety question.

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

- D. 10 CFR 50, Appendix B, Criterion III, Design Control, in part, requires that measures be established to assure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2, Definitions, and as specified in the license application are correctly translated into procedures and instructions.

Contrary to the above, design requirements were not correctly translated into procedures. Specifically, the 100 percent reactor power value was increased in 1981 from 2472 MWth to 2544 MWth and Operating Procedure OP-103A, Startup Curves, was not updated to correct for this increase until July 21, 1995.

This is a Severity Level IV Violation (Supplement 1)

- E. 10 CFR 50, Appendix B, Criterion III, Design Control, in part, requires that measures be established to assure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2, Definitions, and as specified in the license application are correctly translated into procedures and instructions.

Contrary to the above, design requirements were not correctly translated into procedures. Specifically, the design of valve MUV-64 was changed from a disabled, air operated valve (locked in the open position) to a manual, gear driven, chain operated valve, without issuing procedure changes to reflect the intended use and operation of the valve.

This is a Severity Level IV Violation (Supplement 1)

- F. 10 CFR 50, Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, as of May 10, 1996, the licensee had failed to implement prompt corrective actions for Emergency Feedwater Initiation and Control operational problems and concerns. Some of these problems

and concerns dated back to 1986. Corrective modifications were funded in 1994 for installation during Refueling Outage 10 (spring 1996). However, with the approach of Refueling Outage 10, these modifications were deferred until Refueling Outage 11, over concerns expressed by operations management and the Plant Review Committee.

This is a Severity Level IV Violation (Supplement 1).

- G. 10 CFR 50, Appendix B, Criterion III, requires the licensee to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions. For this to be accomplished, the values of parameters (e. g., equipment input amperage) used in design, calculations and the design inservice inspection boundaries specified through drawings and the inservice inspection program must be correct.

Contrary to the above, on March 10, 1996, the licensee failed to assure that applicable regulatory requirements and the design basis were correctly translated into specifications, drawings, procedures, and instructions in that:

- (1) The design input current used in calculations for safety related battery charger (MAR 93-05-07-01) and 4160/480 volt transformer (MAR 95-08-22-01) replacements were incorrect. The input current used in the calculations was 56 amperes, whereas the correct value was 62 amperes.
- (2) The inservice inspection class 2/3 makeup system boundary shown on FSAR drawing FD-302-661, sheet 4, was not moved from valve MUV-64 to valve MUV-65 in 1984, when the Engineered Safeguard signal was removed from MUV-64. With that change, MUV-64 could no longer be considered a boundary, as it was open and would not automatically close to provide a boundary.

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Florida Power Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within

the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 4th day of Oct 1996