



Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

October 14, 1996
3F1096-07

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Subject: Notice of Violation (NRC Inspection Report No.50-302/96-08)
NRC to FPC letter, 3N0996-07, dated September 12, 1996

Dear Sir:

In the subject Inspection Report, Florida Power Corporation (FPC) received a Notification of Violation (NOV) involving two examples of untimely corrective actions. This correspondence provides our response.

Sincerely,

P.M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB/RLM

cc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector

9610220420 961014
PDR ADOCK 05000302
Q PDR

**FLORIDA POWER CORPORATION
NRC INSPECTION REPORT NO. 50-302/96-08
REPLY TO A NOTICE OF VIOLATION**

VIOLATION 50-302/96-08-01

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

1. Contrary to the above, as of July 1996, the licensee had failed to take prompt corrective actions to address discrepancies identified in February 1995 during a make-up system audit.
2. Contrary to the above, on July 12, 1996, the licensee failed to initiate prompt corrective actions to address the identification of an increasing trend in excessive vibration on the spent fuel pump cooling fan motor, which was originally identified in 1994.

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

REASON FOR THE VIOLATION

In the first example, the reason for the violation was personnel error by the individual responsible for maintaining the tracking data base. A Problem Report (PR) had been written to document and track the corrective actions for the problems identified in the make-up system audit. One of those corrective actions, when completed, resulted in further actions being required. However, when the corrective action was closed, the additional actions were not added to the PR tracking system. This resulted in failure to complete these actions in a timely manner. Contributing to the problem was a lack of management oversight that led to inadequate resources within the Tracking and Trending Group (TTG) and the use of multiple tracking systems.

In the second example, the reason for the violation was a lack of sensitivity of engineering personnel to the requirements for promptly identifying and correcting problems with safety related equipment. Two factors contributed to this lack of sensitivity: the two spent fuel pump cooling fans had been considered for abandonment; and it was engineering's judgement that these fans were not required for the operability of the system. This resulted in the problem being inappropriately prioritized.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

For the first example, the additional actions were added to the PR tracking database and dispositioned or repaired. To provide confidence that this was an isolated occurrence, a review was performed of 10% of all PRs issued in 1995. All other corrective actions from the PRs were found to have been appropriated entered in the data base and tracked.

For the second example, engineering evaluations are being performed to either justify the abandonment of the fans or to modify them to reduce the vibration to acceptable levels. Presently, the spent fuel pump cooling fan with elevated vibration levels has been declared inoperable. To determine broader aspects of this example, a review of the Plant Equipment Condition Monitoring Report was performed and revealed similar long-term vibration problems with safety related fans AHF-15A/B and non-safety related sump pumps WDP-22A/B. An Analysis/Calculation M94-0006 was completed in 1994 that concluded fans AHF-15A/B were not required for operability of the decay heat closed cycle cooling pumps and could be abandoned in place, yet no further design documents have been issued to change the plant. Problem Reports were written to bring about resolutions to AHF-15A/B and WDP-22A/B.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The individual involved in the first example was given STAR training (Stop, Think, Act, Review) and fully understands the importance of self-checking. The TTG group has since been incorporated into the Nuclear Safety Assessment Team within the Quality Programs department to provide additional resources for this effort. The Problem Report process, including the tracking system, is being totally revamped based on Failure Prevention International (FPI) technology. This revision is scheduled for completion in November, 1996 and will implement a single site wide tracking system to further assure that corrective actions are properly completed.

For the second example, an Engineering Study Book entry was issued to all Nuclear Plant Technical Support personnel that addressed timeliness of problem resolution and sensitivity to equipment reliability and operability concerns. Resolutions to the aforementioned problem reports will also include corrective actions to ensure plant personnel are aware of the lessons learned including the need to appropriately prioritize work on safety related equipment or to properly and completely change the classification.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

For the first example, full compliance was achieved with the either the disposition or repair of the last hanger in October, 1996.

For the second example, full compliance will be achieved prior to reactor start up from the present maintenance outage with the successful completion of modifications to the fans or the justification for abandonment.