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**Florida
Power**
CORPORATION

September 12, 1985
3F0985-10

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. 85-29

Dear Sir:

Florida Power Corporation provides the attached as our supplemental response to the subject inspection report.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Attachment

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**FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-29**

VIOLATION 85-29-02

Technical Specification 6.8.1.j requires adherence to the procedures delineated in the Offsite Dose Calculation Manual (ODCM).

The ODCM Representative Sampling Method No. 3.1-5 requires the reactor building (RB) purge exhaust fans to be operating whenever both the RB personnel and equipment hatches are open.

Contrary to the above, during the period from 10:20 a.m. on July 13, 1985, to 7:10 p.m. on July 15, 1985, the RB personnel and equipment hatches were open while the RB purge exhaust fans were inoperable.

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

RESPONSE

1) **FLORIDA POWER CORPORATION'S POSITION**

Florida Power Corporation (FPC) agrees with the stated violation in that RB personnel and equipment hatches were open while the RB purge exhaust fans were inoperable.

2) **APPARENT CAUSE OF VIOLATION**

Operations personnel were unfamiliar with the requirements of the Offsite Dose Calculation Manual (ODCM). The ODCM is used primarily by Health Physics and Emergency Planning personnel with very few requirements for Operations personnel. Based on the unfamiliarity with this manual, the applicable requirements of the ODCM when the Reactor Building Purge is secured were not followed.

3) **CORRECTIVE ACTIONS**

A short term instruction was issued to familiarize licensed personnel with applicable ODCM requirements.

A placard has been placed at the control station for RB Purge Exhaust Fans to provide Operations personnel with guidance on securing the Purge when the personnel and equipment hatches are open.

4) **ACTION TAKEN TO PREVENT RECURRENCE**

The above actions are considered sufficient to prevent recurrence.

5) **DATE OF FULL COMPLIANCE**

Florida Power Corporation was in full compliance on July 15, 1985 after establishing RB purge.

VIOLATION 85-29-04

Technical Specification 4.9.2 requires a channel functional test of each source range neutron flux monitor once per 7 days.

Contrary to the above, during the period June 21 - July 4, 1985, neither source range neutron flux monitor had been functionally tested.

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

RESPONSE

1) FLORIDA POWER CORPORATION'S POSITION

Florida Power Corporation (FPC) agrees that during the period June 21 - July 4, 1985, neither source range neutron flux monitor had been functionally tested.

2) APPARENT CAUSE OF VIOLATION

On July 4, 1985, FP-601, Fuel Handling Equipment Operations, was amended and performed for the purpose of equalizing spacing between fuel elements. FP-601 required that source range instruments be monitored even though the operation was not to be considered a core alteration or positive reactivity change. However, FP-601 did not provide assurance that source range functional test had been performed prior to spacing adjustment.

On June 27, 1985, Shift Supervisor on Duty (SSOD) elected to suspend SP-220, Source Range Functional Tests During Refueling Operation, and voluntarily enter the action statement for Technical Specification 3.9.2 because no core alterations or positive reactivity changes were anticipated in the immediate future. Suspension of SP-220 forced the plant into Technical Specification 3.9.2.a action statement, i.e.: "...immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes.....". Voluntary entry into the Technical Specification action statement should not have been made. This type of action, however, is within the authority of the SSOD. Once entered, appropriate actions must be taken to preclude activities outside the Limiting Condition for Operation. These follow-up actions were insufficiently carried out in this case.

FP-601, Fuel Handling Equipment Operations, did not assure that SP-220 was being performed on its required frequency.

3) CORRECTIVE ACTIONS

SP-220, Source Range Functional Tests During Refueling Operations, was reestablished and performed satisfactorily on July 5, 1985.

4) ACTION TAKEN TO PREVENT RECURRENCE

Shift supervisors were further cautioned about voluntary entry into action statements.

5) DATE OF FULL COMPLIANCE

Florida Power Corporation was in full compliance with Technical Specification 4.9.2.a on July 5, 1985.

VIOLATION 85-29-05

Technical Specification 6.8.1.a requires adherence to procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix A, requires administrative procedures for bypassing of safety functions and jumper control, and requires procedures for performing maintenance.

Compliance procedure CP-113, Handling and Controlling Work Requests and Work Packages, requires electrical jumpers to be logged and independently verified on Enclosure 5, Equipment Alteration Log, and requires that when work is complete, that the equipment be restored to the designed condition and independently verified. Procedure CP-113 also requires that equipment left in an altered condition following work must have an approved Modification Approval Record.

Maintenance Procedure, MP-108B, Control Rod Drive Handling Mechanical, requires verification that the reactor vessel water level is between 2-6 inches below the reactor vessel flange prior to control rod drive installation.

Contrary to the above:

- On July 11, 1985, a jumper was installed for troubleshooting in the control circuit for the "B" Emergency Diesel Generator Room Fan (AHF-22D) without completion of the Equipment Alteration Log. This jumper was left in place following troubleshooting to allow for fan operation without the completion of a Modification Approval Record until July 12, 1985.
- Between July 20-23, 1985, the control rod drive motor tubes were reinstalled with a reactor vessel level of 4 feet 2 inches below the reactor vessel flange.

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

RESPONSE

1) FLORIDA POWER CORPORATION'S POSITION

- Florida Power Corporation (FPC) agrees with the stated violation in that a jumper installed in the control circuitry of one of two Emergency Diesel Generator room fans (AHF-22D) was not properly controlled.
- FPC agrees the control rod drive motor tubes were reinstalled with a reactor vessel level of 4 feet 2 inches below the reactor vessel flange, however, FPC believes the intent of the procedural step in MP-108B was observed. The intent of the step is to ensure that the vessel water level is below the CRDM flange prior to unbolting. The water level was verified to be at the maintenance level which was several feet below the reactor vessel flange.

2) APPARENT CAUSE OF VIOLATION

- Temporary alterations must be logged and controlled either by Enclosure 5 of CP-113 if installed on a temporary troubleshooting basis (generally not to exceed one shift) or by a plant modification if not installed for troubleshooting. Enclosure 5 of CP-113 states that

VIOLATION 85-29-05 (CONT'D)

equipment cannot be declared operable until all alterations are restored to design (as found) status. The Outage Shift Manager directed that the jumper be left in place since it was required for equipment operability, however, the required plant modification approval was not initiated. A misunderstanding of the requirements of CP-113 and CP-114, Procedure for Preparation of Permanent and Temporary Modifications, contributed to the cause.

- The cause of the second example of violation was failure to initiate an Immediate Temporary Change (ITC) and an inadequate procedure.

3) CORRECTIVE ACTIONS

- Upon identification of this condition, the jumper in question was removed and the fan declared inoperable until the control circuit could be repaired.
- A revision to MP-108B has been incorporated which ensures that the vessel water level is below the flange and no longer specifies a specific level be maintained, i.e., 2 - 6 inches below the reactor vessel flange.

4) ACTION TAKEN TO PREVENT RECURRENCE

The Maintenance Superintendent issued written guidance to maintenance personnel clarifying the intent and scope of CP-113 in controlling temporary alterations for troubleshooting. He also initiated an investigation of previous work packages to assure there were no other known jumpers installed without proper controls. A change to CP-113 will be made to clarify its applicability and limitations with respect to jumper control. Individuals involved in this violation were counseled.

In the second example, the corrective action to revise MP-108B will prevent recurrence.

5) DATE OF FULL COMPLIANCE

A revised procedure to clarify jumper control will be issued by October 1, 1985.