

December 9, 1996

Florida Power Corporation
Crystal River Energy Complex
Mr. P. M. Beard, Jr. (SA2A)
Sr. VP, Nuclear Operations
ATTN: Mgr., Nuclear Licensing
15760 West Power Line Street
Crystal River, FL 34428-6708

SUBJECT: MEETING SUMMARY - SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
CRYSTAL RIVER - DOCKET NO. 50-302

Dear Mr. Beard:

This refers to the SALP meeting conducted at the Crystal River facility on December 2, 1996. The purpose of the meeting was to discuss your performance during the past SALP cycle. A list of attendees and a copy of our handout is enclosed.

In accordance with Section 2.790 of the NRC's "Rule of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact me at (404) 331-5526.

Sincerely,

Orig signed by Kerry D. Landis

Kerry D. Landis, Chief
Reactor Projects Branch 3
Division of Reactor Projects

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

Enclosures: 1. List of Attendees
2. NRC Handout

cc w/encs: Gary L. Boldt, Vice President
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Florida Power Corporation
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cc w/encs: Continued see page 2

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cc w/encls: Continued
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Distribution w/encls:

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B. Crowley, RII


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NRC Resident Inspector

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LIST OF ATTENDEES

Florida Power Corporation

P. Beard, Senior Vice President, Nuclear Operations
G. Boldt, Vice President, Nuclear Production
B. Hickie, Director, Nuclear Plant Operations
L. Kelly, Director, Nuclear Operations Site Support
F. Sullivan, Manager, Nuclear Operations Engineering
J. Baumstark, Director, Quality Programs
J. Terry, Manager, Nuclear Plant Technical Support

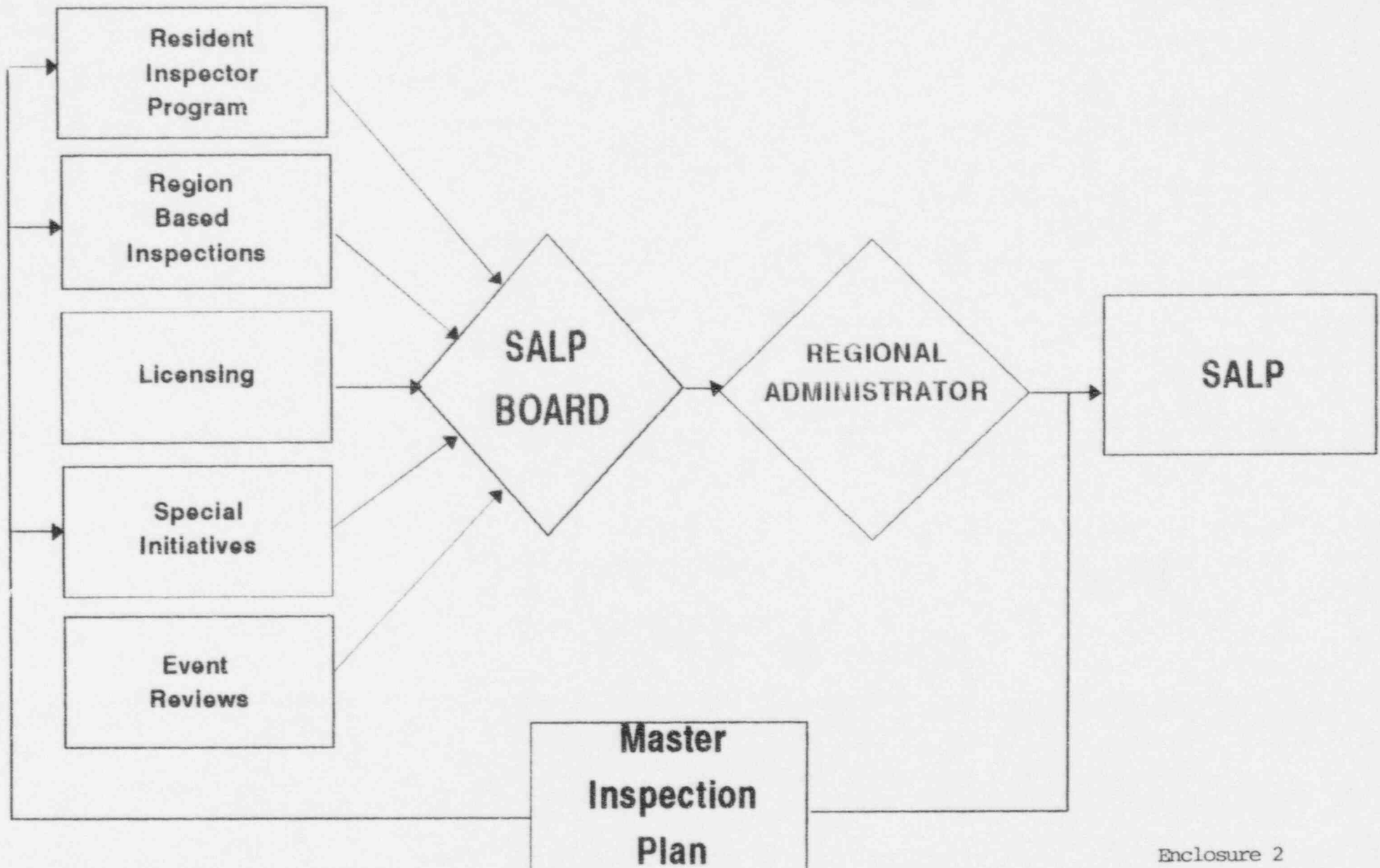
Nuclear Regulatory Commission

L. Reyes, Deputy Regional Administrator, RII
S. Cahill, Resident Inspector, Watts Bar
C. Clark, Public Affairs Officer
T. Cooper, Resident Inspector, Crystal River
F. Hebdon, Director II-3, Office Of Nuclear Reactor Regulations (NRR)
J. Johnson, Deputy Director, Division Reactor Projects
K. Landis, Chief, Branch 3, Division of Reactor Projects
L. Raghaven, Project Manager, Project Directorate II-1, NRR

Members of the News Media

Local Officials

SALP PROCESS



CRYSTAL RIVER 3

SALP BOARD MEMBERS

- JOHNS JAUDON: Acting Deputy Director
Division of Reactor Safety
Region II
- JON JOHNSON: Acting Deputy Director
Division of Reactor Projects
Region II
- FRED HEBDON: Director
Project Directorate II-3
Office of Nuclear
Reactor Regulation

CRYSTAL RIVER 3

SALP RATING SUMMARY

FUNCTIONAL AREA	RATING THIS PERIOD	RATING LAST PERIOD
PLANT OPERATIONS	3	2
MAINTENANCE	2	2
ENGINEERING	3	2
PLANT SUPPORT	2	1

PERFORMANCE CATEGORY RATINGS

- Category 1.** Licensee attention and involvement have been properly focused on safety and resulted in a superior level of performance. Licensee programs and procedures have provided effective controls. The licensee's self-assessment efforts have been effective in the identification of emergent issues. Corrective actions are technically sound, comprehensive, and thorough. Recurring problems are eliminated, and resolution of issues is timely. Root cause analyses are thorough.
- Category 2.** Licensee attention and involvement are normally well focused and resulted in a good level of safety performance. Licensee programs and procedures normally provide the necessary control of activities, but deficiencies may exist. The licensee's self-assessments are normally good, although issues may escape identification. Corrective actions are usually effective, although some may not be complete. Root cause analyses are normally thorough.
- Category 3.** Licensee attention and involvement have resulted in an acceptable level of safety performance. However, licensee performance may exhibit one or more of the following characteristics. Licensee programs and procedures have not provided sufficient control of activities in important areas. The licensee's self-assessment efforts may not occur until after a potential problem becomes apparent. A clear understanding of the safety implications of significant issues may not have been demonstrated. Numerous minor issues combine to indicate that the licensee's corrective action is not thorough. Root cause analyses do not probe deep enough, resulting in the incomplete resolution of issues. Because the margin to unacceptable performance in important aspects is small, increased NRC and licensee attention is required.

PLANT OPERATIONS

STRENGTH

- IMPROVED PROBLEM IDENTIFICATION - PLANT DESIGN

CHALLENGES

- MANAGEMENT OVERSIGHT AND INVOLVEMENT
- INTERFACES WITH OTHER ORGANIZATIONS
- CONTROL OF REFUELING OPERATIONS
- ATTENTION TO DETAIL
- SELF ASSESSMENT & QUALITY VERIFICATION

MAINTENANCE

STRENGTH

- EFFECTIVE IMPLEMENTATION OF ON-LINE MAINTENANCE PROGRAM

CHALLENGES

- BALANCE OF PLANT EQUIPMENT PROBLEMS
- INATTENTION TO DETAIL
- POOR WORK CONTROL
- PROCEDURAL ADHERENCE
- WEAK INTER-DISCIPLINE COMMUNICATION
- SELF ASSESSMENT & QUALITY VERIFICATION

ENGINEERING

STRENGTH

- IMPROVED PROBLEM IDENTIFICATION

CHALLENGES

- MANAGEMENT OVERSIGHT AND INVOLVEMENT
- ENGINEERING EFFECTIVENESS
- KNOWLEDGE AND UNDERSTANDING OF THE DESIGN BASIS
- QUALITY OF LICENSING SUBMITTALS

PLANT SUPPORT

STRENGTHS

- DOSE CONTROL
- WASTE REDUCTION
- CORRECT EVENT CLASSIFICATION

CHALLENGES

- MANAGEMENT INVOLVEMENT IN SECURITY
- AGGRESSIVE DRILLING
- SELF ASSESSMENT & QUALITY VERIFICATION



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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ATLANTA, GEORGIA 30323-0199

November 25, 1996

Florida Power Corporation
Crystal River Energy Complex
Mr. P. M. Beard, Jr. (SA2A)
Sr. VP, Nuclear Operations
ATTN: Mgr., Nuclear Licensing
15760 West Power Line Street
Crystal River, FL 34428-6708

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
(NRC INSPECTION REPORT NO. 50-302/96-99)

Dear Mr. Beard:

The Systematic Assessment of Licensee Performance (SALP) for the period September 17, 1995, through October 5, 1996, has been completed for Crystal River. The results of the assessment are documented in the enclosed SALP report, which will be discussed with you at a public meeting at the Crystal River Site on December 2, 1996, at 12:30 p.m. At the meeting, you should be prepared to discuss our assessment and any initiatives that address our concerns and challenges identified in the SALP report.

Overall performance at the facility continued to decline from the previous assessment period as evidenced by reduced performance in operations, engineering and plant support. Self-assessments and quality assurance functions have been only minimally effective across the functional areas. Weakness in management oversight has contributed to problems, and organizational interface controls did not assure team work and organizational cooperation.

Operations performance declined from good to acceptable as a result of continuing problems. Management initiated corrective actions late in the period in response to enforcement actions, and some improvement has been noted in problem identification. Maintenance performance was sustained at a good level, but issues from the previous assessment period persisted, an indication of inability to implement effective corrective actions. Plant support was unable to sustain past superior performance, and the area was assessed as good. Emergency preparedness remained at a superior level of performance, but performance in some of the other sub-categories of this functional area exhibited weaknesses.

Engineering continued to decline; this represents two consecutive assessments of performance decline in this functional area from superior performance to approximately acceptable over a two year span. Management has initiated extensive corrective actions which remain to be demonstrated as effective. The recent decision to shut down the unit to effect engineering evaluations of questionable safety systems' margins was prudent. Some improvement was noted in problem identification, but this was offset by relatively poor performance in root cause analysis and corrective actions.

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The common threads running through the assessment that contributed to the decline in performance are weak management oversight, ineffective self-assessment, insufficient quality assurance involvement and an insensitivity to regulatory requirements. The newly revised corrective action plan conceptually has addressed the weaknesses, but proof of performance improvement will be in the implementation of the proposed actions, which requires the immediate and full attention of both management and staff.

You are requested to respond to this letter in writing within thirty days. This response should address the weaknesses in the engineering and operations functional areas.

In accordance with Section 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Should you have any questions or comments, I would be pleased to discuss them with you.

Sincerely,

Orig signed by Stewart D. Ebnetter

Stewart D. Ebnetter
Regional Administrator

Enclosure: As stated

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

cc w/encl:
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DATE	11 / / 96	11 / / 96	11 / / 96	11 / / 96	11 / / 96
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SALP REPORT - CRYSTAL RIVER
50-302
SEPTEMBER 17, 1995 - OCTOBER 5, 1996

I. BACKGROUND

The SALP Board convened on October 30, 1996, to assess the nuclear safety performance of Crystal River Unit 3 for the period of September 17, 1995, through October 5, 1996. The Board Meeting was conducted pursuant to NRC Management Directive 8.6, "Systematic Assessment of Licensee Performance." Board members were Johns P. Jaudon, (Chairperson), Deputy Director, Division of Reactor Safety, Region II (RII); Jon R. Johnson; Deputy Director, Division of Reactor Projects, RII; and Frederick J. Hebdon, Director, Project Directorate I/II, Office of Nuclear Reactor Regulation.

The performance category ratings and the assessment functional areas used below are defined and described in NRC Management Directive 8.6, "Systematic Assessment of Licensee Performance (SALP)."

II. PERFORMANCE ANALYSIS - PLANT OPERATIONS

This functional area addresses the control and execution of activities directly related to operating the plant. It includes activities such as plant startup, power operation, plant shutdown, and response to transients. It also includes initial and requalification training progress for licensed operators.

Overall performance in the Plant Operations area was acceptable. The early part of this period demonstrated completion of a successful operating cycle. During the latter part of this period, there was the challenge of an extended refueling outage and other forced outages.

Routine operational activities conducted by control room operators were considered acceptable. Significant improvement had been made with respect to encouraging operators to identify problems as demonstrated by the large number of Precursor Cards written. This demonstrated a good questioning attitude, especially with regard to the adequacy of plant design or translation of the design into programs and procedures. The operations staff assigned to the Emergency Operating Procedures reevaluation group identified design issues associated with the High Pressure Injection System instrumentation, which led to an early shutdown for the April Refueling outage. Performance was not as consistent with the initiation of Problem Reports or the conduct of root cause evaluations for refueling events or human performance issues.

During this assessment period licensee management responded to significant NRC enforcement action regarding previous, unacceptable management standards for procedural adherence, the conduct of tests and safety evaluations, and interfaces with the engineering staff. Initiatives were taken to strengthen plant operations management and shift crews. Routine operational activities and decisions indicated

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adequate safety focus. Technical support to plant operations demonstrated improvement later in the period with a decrease in the number of control room deficiencies.

Management oversight and involvement in refueling activities and overtime control continue to be a challenge. Senior Reactor Operators showed inattentiveness, a lack of close oversight, and a lack of formal corrective actions for fuel handling errors. During the forced outage at the end of the period, station management strengthened overtime controls and limited routinely scheduled working hours.

Operator response late in the period to two plant maneuvers and to a reactor trip were well supervised; however, interfaces between plant operators and other organizations remained a challenge. Performance by licensed operators indicated a weakness in the interface between Plant Operations and the Nuclear Training Department. A senior operator misinterpreted a procedure and exceeded the RCS cooldown rate limit; an operating crew chose not to implement a new procedure for a more rapid response to a condenser tube rupture because the crew was not comfortable using it; and weakness was demonstrated in the program for notifying Nuclear Training staff of new or revised procedures.

Normal operating and emergency operating procedures in general were adequate for accomplishing their intended functions. Observation of plant tours and operation surveillances indicated deficiencies in log taking and inconsistencies in equipment monitoring. Management provided support staff resources to complete the EOP enhancement program by the latter part of this period.

Quality Assurance audits failed to provide a full assessment of various operational programs and policies on-site. These audits were checklist or question-oriented and lacked full discussion or safety significance of problems. The Operations Department was responsive to outside recommendations; however, Plant Operations was not effectively utilizing its own self-assessment program to improve performance.

The Plant Operations area was rated **Category 3**.

III. PERFORMANCE ANALYSIS - MAINTENANCE

This functional area assesses licensee activities in the areas of testing and maintaining plant structures, systems, and components. Activities assessed include preventive, predictive, and corrective maintenance, as well as balance of plant equipment condition, and surveillance testing activities.

During the middle period of the SALP, Crystal River was shut down for a refueling outage. During power ascension, there were two reactor transients and one reactor trip as a result of secondary side equipment problems or maintenance errors, indicating a need for additional management attention. In general, outage activities, both during the refueling outage and on-line system outages, were implemented well.

Strengths were noted in the effectiveness of one on-line maintenance program and productive use of diagnostic equipment to identify and correct problems. However, the on-line maintenance backlog has continued to grow. During the refueling outage, maintenance issues that could be performed on-line, were postponed to future on-line maintenance activities. This resulted in a significant increase in the non-outage maintenance backlog and a large backlog of control room deficiencies following the outage. Following startup from the refueling outage, a maintenance error caused an unplanned unit outage.

Failure to follow procedures, which was a problem during the previous SALP period, continued to be a challenge this period. Maintenance rework is still a challenge due to weak work practices. Craftsmen accomplished work in spite of procedure deficiencies, not as a result of compliance with procedures.

Several instances of inattention to detail were also noted, such as deferral of the B-K-1 welds in the second 10-year ISI program, which is not permitted by the ASME Code and which violated the Technical Specifications. Other failures resulted in inoperable equipment and equipment failures. In some case, these failures have indicated an inadequate sensitivity to regulatory requirements.

In addition, there have been incidents of maintenance workers failing to keep the control room operators adequately informed of ongoing work within the plant.

During the latter part of the SALP period, the licensee initiated new maintenance work control, planning and tracking programs including use of a top-10 list of activities and a 13-week rolling schedule. These initiatives, if properly implemented, should address previous work planning problems and avoid work being classified as "emergent."

The licensee's self-assessment of the maintenance program did not reveal insights into strengths and weaknesses of the maintenance program.

The Maintenance area is rated **Category 2**.

IV. PERFORMANCE ANALYSIS - ENGINEERING

The functional area assesses activities associated with the design of plant modifications and engineering support for operations, maintenance, surveillance, and licensing activities.

Licensee performance in this area continued to decline. Weaknesses from the last SALP period persisted in the areas of management oversight, human performance errors, control of modifications, and quality of licensing submittals. During this SALP period, the NRC noted a lack of improvement and identified the major areas of continuing engineering weakness as 1) insufficient management oversight and involvement, 2) marginally effective engineering organization, 3) lack of an adequate understanding and knowledge of the Crystal River 3 design basis.

and 4) lack of sensitivity to and/or knowledge of regulatory requirements. NRC enforcement actions in the engineering area increased and included five severity level III violations.

Insufficient management oversight and involvement were evident by a weak corrective action program, errors in recent engineering work, and a large engineering work backlog. Also evident was a lack of appropriate standards including root cause evaluations and event investigations, 10 CFR 50.59 safety evaluations, self-assessments, operability evaluations, licensing submittals, and the role of the quality organization.

The corrective action program was weak, as indicated by several instances of failures to initiate appropriate corrective actions, untimely corrective actions, and inadequate corrective actions. However, an improvement was noted in problem identification, in that there were increases in the numbers of Precursor Cards and Licensee Event Reports for design issues.

A marginally effective engineering organization was indicated by examples of failures to follow procedures, design control errors, and missing or improper design outputs. Some of the engineering process errors led to design deficiencies.

Lack of an adequate understanding and knowledge of the Crystal River 3 design basis was evidenced by design errors in the electrical, instrumentation and control, Appendix R, mechanical, and hydraulic areas. In addition, there were design-related inadequacies in safety classification of equipment, surveillance requirements, and operating procedures.

A lack of sensitivity for the need to comply with regulations was evident in the continued poor quality of licensing submittals, including incorrect information and deficient analyses. There were also examples of untimely reporting to the NRC and improper interpretation and implementation of the Technical Specifications.

During the SALP period, the licensee acknowledged the need for improved performance and initiated many changes to address engineering problems including chartering an Independent Review Panel, with members from outside of FPC, to review the design basis issues and management design control processes and creating a Nuclear Safety Assessment Team (similar to an Independent Safety Engineering Group). Other changes included operations review of engineering calculation inputs, engineering review of Emergency Operating Procedure revisions, and creation of an Engineering Design Review Panel to review modifications. Improved management oversight and involvement will be required to assure effectiveness of these changes in improving the control of the design process, the engineering support to plant operations and maintenance, and the quality of licensing submittals.

The Engineering area is rated **Category 3**

V. PERFORMANCE ANALYSIS - PLANT SUPPORT

This functional area addresses radiological controls, radioactive effluents, chemistry, emergency preparedness, security, fire protection, and housekeeping controls.

Overall the radiological control program was effectively implemented. Personnel radiation exposures were well controlled during the period with exposures significantly below regulatory limits. Radiation work permit compliance was an area requiring additional licensee attention during the assessment period. The site collective dose in 1996 was significantly higher than anticipated due to several developments including: the deletion of a source term reduction procedure during the refueling outage shutdown schedule, the increased maintenance activities performed during the extended refueling outage, and unanticipated forced outages late in the assessment period.

Chemistry and radiological effluent programs remained effective. The issuance of a chemistry quality control manual was a program enhancement. An effective effluent control program limited effluents and associated doses to the public to a small fraction of regulatory limits. Environmental monitoring demonstrated that plant operations had caused negligible impact to environs of the plant. Radioactive material was transported in accordance with regulatory requirements. The licensee maintained an aggressive plant chemistry program to assure that system degradation was minimized. Challenges included better documentation of corrective actions and strict adherence to regulatory requirements.

The emergency preparedness program continued to provide a high level of readiness to respond to events. The licensee's performance during November 1995 annual emergency preparedness exercise was satisfactory. With the exception of the technical support center emergency ventilating system, the licensee's emergency response facilities were good and adequately maintained. The emergency preparedness staff was experienced and licensee management demonstrated good support for emergency planning and preparedness at the Crystal River site.

The overall security program was adequately implemented. However, inspectors found assessments and corrective actions for safeguards contingency plan issues and other problems identified during the period were not always thorough or comprehensive. Management oversight of the security plan implementation and changes to it was also a significant program challenge.

The fire protection program remained effective during this assessment period. Combustible materials were properly controlled and facilities were satisfactorily maintained. However, some maintenance and engineering concerns associated with fire protection equipment were

identified. Good progress was made by the licensee in resolving Thermo-Lag problems.

The Plant Support area is rated Category 2