



85 JUL 18 A 1:25

**Florida
Power**
CORPORATION

July 12, 1985
3F0785-17

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. 85-16 Revised Response

Dear Sir:

As requested by the NRC Senior Resident Inspector for Crystal River 3, Florida Power Corporation provides the attached revised response to the subject inspection report.

Sincerely,

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

AEF/feb

Attachment

8508020384 850712
PDR ADOCK 05000302
Q PDR

IE01 11

FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-16
REVISED RESPONSE

VIOLATION 85-16-01

10 CFR 50, Appendix B, Criterion V, and FSAR Section 1.7.1.5 require that activities affecting quality shall be prescribed by documented instructions, procedures or drawings. . . and shall be accomplished in accordance with these instructions, procedures or drawings. The pipe support drawing and modification drawing provide installation dimensions for piece "H" of pipe support MUH 556. The "Piping Hanger - Final Inspection" requirements provided on inspection plan number WR-60571 for pipe support MUH 556 required QC verification that "the overall configuration and sizing of the completed hanger assembly or modification conform to the applicable approved engineering drawing."

Contrary to the above, completed, installed, modified, inspected and QC accepted pipe support MUH 556 piece "H" installation dimensions did not "conform" with the applicable approved engineering drawings. In addition, unauthorized loads (scaffolding) were being partially supported by the pipe support. No procedure or instructions were available authorizing or prohibiting installation of scaffolding/staging on permanent plant equipment.

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

RESPONSE

(1) Florida Power Corporation's Position:

Florida Power Corporation concurs with the stated violation that the pipe support installation dimensions did not conform with the applicable approved engineering drawings and that no specific procedures were available authorizing or prohibiting installation of scaffolding/staging on permanent plant equipment.

(2) Designation of Apparent Cause:

The previous inspection of the subject pipe support failed to identify and document the discrepancy between the as-built dimensions and the drawing. Also, the deficient procedural controls on scaffolding is considered to be an administrative oversight.

(3) Corrective Action:

A Field Change Notice (FCN) was issued to assure the drawing associated with this support is revised to reflect the installed configuration. An engineering analysis of the support, performed as part of the FCN, determined that the installed configuration is conservative and has a factor of safety in excess of four (4).

A memorandum has been sent to the Nuclear Maintenance Superintendent requesting that all appropriate personnel be notified not to use piping and/or plant equipment as scaffolding supports.

(4) Corrective Action to Prevent Recurrence:

The existing inspection procedure, for the installation of pipe supports, presently requires that all dimensions be verified and documented for new supports. For modifications to existing supports, the procedure requires that all dimensions associated with the modification be verified and documented. These controls are considered adequate to prevent future recurrence of this problem. Procedure AI-1803 was revised to specifically prohibit installation of scaffolding/staging on permanent plant equipment.

(5) Date of Full Compliance:

Full compliance was achieved on July 5, 1985.