

# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302

December 20, 1996  
3F1296-17

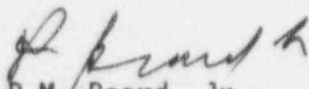
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555-0001

Subject: Notice of Violation (NRC Inspection Report No.50-302/96-15)  
NRC to FPC letter, 3N1196-20, dated November 27, 1996

Dear Sir:

In the subject Inspection Report, Florida Power Corporation received a Notification of Violation. Please accept this correspondence as 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

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**FLORIDA POWER CORPORATION  
NRC INSPECTION REPORT NO. 50-302/96-15  
REPLY TO A NOTICE OF VIOLATION**

**VIOLATION 50-302/96-15-01**

Crystal River Technical Specifications (TS) Surveillance Requirement 3.3.18.1 requires that a monthly channel check shall be performed on each Remote Shutdown System Instrumentation Function Channel that is normally energized. The required Remote Shutdown System Functions are listed in TS Table 3.3.18-1.

Contrary to the above, on October 8, 1996 no licensee surveillance procedure, including Surveillance Procedure (SP) SP-338, Remote Shutdown and Post Accident Monitoring Channel Check, Revision 25, included a channel check for the Motor Driven Emergency Feedwater Pump Discharge Pressure Gauge, EF-2-PI, which is listed in TS Table 3.3.18-1.

**ADMISSION OR DENIAL OF THE ALLEGED VIOLATION**

Florida Power Corporation (FPC) accepts the violation.

**REASON FOR VIOLATION**

The primary cause of the event was personnel error in the procedure preparation and review process. With the implementation of ITS in March, 1994, the frequency of the SP-349A EFP-1 pump run was changed from monthly to once per 45 days on a STAGGERED TEST BASIS. The monthly CHANNEL CHECK for EF-2-PI was removed from SP-349A and added to SP-338, "Remote Shutdown and Post Accident Monitoring Channel Check." At this time the CHANNEL CHECK became a simple check that the single instrument was reading idle pump discharge pressure.

In June, 1995, a procedure enhancement request was made to return the EF-2-PI CHANNEL CHECK to SP-349A to obtain a better check of the instrument function. This change was made on June 22, 1995. SP-349A was erroneously changed to indicate a frequency for performance of the EF-2-PI CHANNEL CHECK of once per 92 days. The error was not identified in the review and approval cycle. Information was then added to Nuclear Operations Commitment System (NOCS) commitment (#060315) erroneously stating that the "once per 31 day" SR 3.3.18.1 CHANNEL CHECK requirement for EF-2-PI was satisfied by performance of SP-349A.

On October 31, 1995, SP-338 was revised to remove the requirement to perform a CHANNEL CHECK of EF-2-PI. The reason for the removal was that the requirement was satisfied by SP-349A as documented by information in NOCS Commitment 060315.

Between October 31, 1995 and September 2, 1996, while CR-3 was operating in Modes 1, 2, or 3, the required CHANNEL CHECK for EF-2-PI was performed once per 92 days rather than its required once per 31 day frequency. Thus, the Improved Technical Specifications surveillance requirement was not met.

There was confusion over the intent of the Technical Specification and methods of implementing a CHANNEL CHECK for a single, downscale instrument. The surveillance requirement is to perform a channel check of "energized" instruments. The EF-2-PI instrument is a local indicating mechanical Bourdon Tube type gauge with no associated electrical components. EF-2-PI is currently used as only a benchmark

for determining the operability of EFP-1 while EFP-1 is in operation and displaying discharge pressure.

Subsequent investigation also revealed that the instruments currently used to monitor Emergency Feedwater (EFW) operation are not specified in Improved Technical Specification Table 3.3.18-1 Function/Instrument 3.e. The purpose of Improved Technical Specification 3.3.18, Remote Shutdown System, is to ensure that "there is sufficient information available on selected unit parameters to maintain the unit in MODE 3 should the Control Room become inaccessible." Prior to the installation of the Remote Shutdown Panel, EF-2-PI was the only instrument available to monitor the EFW system. However, EFW flow indicators EF-23-FI2, EF-24-FI2, EF-25-FI2, & EF-26-FI2 were installed on the Remote Shutdown Panel. These indicators, rather than EF-2-PI, would be used to monitor the operation of the EFW system should the control room become inaccessible. While the Remote Shutdown Panel EFW flow indicators are not included in the Improved Technical Specifications, their operability is assured by performance of surveillance procedures SP-193B, "EFW Flow Transmitter Channel Calibration," (2-year frequency) and SP-146C, "EFIC Flow Control Verification" (quarterly frequency).

#### CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. The event has been reviewed with personnel responsible for preparation and review of the June, 1995 revision to SP-349A and the October, 1995 revision to SP-338.
2. Procedure AI-400C, "New Procedures and Procedure Change Process," has been revised to include a more focused technical review. This will enhance the results of procedure reviews.

The above two actions were completed on December 2, 1996.

#### CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. Pending satisfactory completion of Action 3, below, appropriate procedure changes will be made to ensure strict compliance with Improved Technical Specification Surveillance Requirement 3.3.18.1 for Function/Instrument 3.e. These changes will be accurately identified in the NOCS commitment.
2. Appropriate calibration and CHANNEL CHECK procedures will be confirmed in-place for instruments currently used in the Remote Shutdown System to maintain the Unit in safe shutdown when the Control Room is inaccessible.
3. Appropriate Improved Technical Specification changes will be submitted to ensure that the Functions/Instruments specified in Table 3.3.18-1 are those currently used in the Remote Shutdown System to maintain the Unit in safe shutdown when the Control Room is inaccessible.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

These items will be completed prior to startup from the current outage.

#### VIOLATION 50-302/96-15-02

10 CFR 50.48(b) states, in part, that all nuclear power plants licensed to operate prior to January 1, 1979 shall satisfy the applicable requirements of Appendix R to this part, including specifically the requirements of section III.0. Crystal River 3 received an operating license on January 28, 1977.

10 CFR 50, Appendix R, Section III.0 states, in part, that the reactor coolant pump shall be equipped with an oil collection system. Such collection systems shall be capable of collecting lube oil from all potential pressurized and unpressurized leakage sites in the reactor coolant pump lube oil systems.

Contrary to the above, on October 10, 1996 the oil collection system for reactor coolant pump D was identified as not being capable of collecting the lube oil from all potential leakage points, in that the lower portion of the oil collection system was not properly installed following the 1996 refueling outage. This resulted in oil leaking from an improperly installed gasket seal on the bottom portion of the collection system and accumulating on the floor. The oil was not drained into the closed tanks which were designed for this purpose.

#### ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation.

#### REASON FOR THE VIOLATION

The leakage from the oil collection system was due to an inadequately sealed mechanical joint at the bottom of the collection system. The cause for the inadequate seal was improper installation in that an oil residue was left on the joint surface during assembly which prevented good sealant adhesion. Although nearly four gallons of oil from the upper oil reservoir of RCP-1D leaked into the collection system, it is estimated that roughly one quart of this oil leaked out of the collection system onto the Reactor Building floor.

#### CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. The affected section of the oil collection system was replaced, the surfaces cleaned, and new sealant applied to all joints.
2. The source of the oil leakage from the RCP-1D upper oil reservoir was identified at three bolted flanges in the oil piping system. A new gasket material will be utilized in the bolted flanges which will work in conjunction with recently installed Belleville springs to provide a leak tight joint.
3. The procedures used for the maintenance and repair of the oil collection system were reviewed by Engineering and it was confirmed that proper instructions were in place for the assembly activities.

#### CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. Inspections on the other Reactor Coolant Pump motor oil collection systems will be performed in a manner similar to RCP-1D. The importance of cleaning surfaces of all residual oil before applying sealant will be stressed and a review of the installation process will be completed with personnel involved with oil collection system maintenance. Although oil was not discovered

below the other motors, an inspection for oil collection system leakage will be made on these motors.

2. FPC recognizes that the current design requires significant maintenance to provide a leak tight system. This will be eliminated by the installation of an upgraded oil collection system design which incorporates welded seams instead of the current bolted configuration. The first upgraded oil collection system was installed during Refuel 10 on RCP-1A. Experience to date has shown that the new oil collection system possesses excellent oil collection properties.

The oil collection system inspections and any required repairs will be completed before startup from the current outage. A review of the violation and the importance of proper oil collection system maintenance with maintenance personnel will also be completed before startup from the current outage.

Date When Full Compliance Will Be Achieved

The remaining oil collection systems will be modified with an improved design prior to restart from Refuel 11.